Law and Governance

Julie Newman
Director of Law and Governance
Council House
Earl Street
Coventry CV1 5RR

10. **Scrutiny Annual Report to Council 2024-2025** (Pages 3 - 30)

    From the Scrutiny Co-ordination Committee, 21 August 2025

11. **Local Plan Review - Submission for Examination** (Pages 31 - 636)

    From Cabinet, 26 August 2025

12. **Local Development Scheme (LDS) Update** (Pages 637 - 654)

    From Cabinet, 26 August 2025

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Coventry City Council

Public Report
Council

Council 2nd September 2025

Name of Cabinet Member:
Not applicable

Director Approving Submission of the report:
Director of Law and Governance

Ward(s) affected:
None

Title: Scrutiny Annual Report 2024-25

Is this a key decision?
No

Executive Summary

The Constitution requires that Scrutiny reports annually to inform Council of its work. The Annual Report sets out the work undertaken by the following bodies over the last municipal year:

- Scrutiny Co-ordination Committee
- Finance and Corporate Services Scrutiny Board
- Education and Children's Services Scrutiny Board
- Business, Economy and Enterprise Scrutiny Board
- Communities and Neighbourhoods Scrutiny Board
- Health and Social Care Scrutiny Board

As set out in the Constitution, the Scrutiny Co-ordination and each Scrutiny Board is responsible for setting its own work programme and, in doing so, consults with relevant Cabinet Members and the Leadership Board. They also consider the wishes of those Members of the Scrutiny Board who are not members of the largest political group on the Council.

The report also provides the recommendations made to the Executive during the last municipal year. Council is asked to consider and approve the report..

Recommendations:

Council is recommended to:

(1) Approve the Scrutiny Annual Report to Council 2024-25 (Appendix 1)
(2) Note the Recommendations made to the Executive (Appendix 2)
(3) Note that the Scrutiny Co-ordination Committee and each Scrutiny Board has an active work programme which is considered at each meeting, when all Members of the Committee/Boards can suggest items for Scrutiny.

List of Appendices included:

Appendix 1 – Scrutiny Annual Report to Council 2024-25
Appendix 2 – Recommendations to the Executive

Other useful background papers can be found at the following web addresses:

None.

Has it been or will it be considered by Scrutiny?

At their meeting on 21st August 2025, Scrutiny Co-ordination Committee agreed the Annual Report for Council and recommended that the Recommendations to the Executive were also included.

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

No.

Will this report go to Council?

Yes – 2nd September 2025

Report title: Scrutiny Annual Report 2024-25

1. Context (or background)

1.1 Coventry City Council operates the Executive/Scrutiny model of Governance, as established by the Local Government Act 2000.

1.2 The Council has five Scrutiny Boards covering all aspects of the Council, as well as a Scrutiny Co-ordination Committee, which is responsible for the overall management of the Scrutiny and Overview function.

1.3 Scrutiny Boards have the power to investigate any matters they consider relevant to their work area and to make recommendations to the Council, the Cabinet, any Cabinet Member or any other Committee of the Council as they see fit.

1.4 The membership of the Scrutiny Co-ordination Committee and Scrutiny Boards is determined by full Council and reflects political proportionality.

1.5 The Scrutiny Co-ordination Committee and each Scrutiny Board is responsible for setting its own work programme and in doing so consults with relevant Cabinet Members and the Leadership Board. They also consider the wishes of those Members of the Scrutiny Board who are not members of the largest political group on the Council

1.6 At its meeting on 21 August, 2025, the Scrutiny Co-ordination Committee considered the Annual Report (Appendix 1). The Committee recommended that recommendations made by Scrutiny to the Executive during the municipal year should be noted by Council and these are detailed in Appendix 2 to this report.

2. Options considered and recommended proposal

2.1 The Constitution requires Scrutiny to report to Council on an annual basis as part of the functions of Scrutiny. Therefore, Council is recommended to:

(1) Agree the Scrutiny Annual Report to Council 2024-25 (Appendix 1)
(2) Note the Recommendations made to the Executive (Appendix 2)
(3) Note that the Scrutiny Co-ordination Committee and each Scrutiny Board has an active work programme which is considered at each meeting, when all Members of the Committee/Boards can suggest items for Scrutiny.

3. Results of consultation undertaken

3.1 There has been no consultation as the Annual Report is a constitutional requirement and there are no proposals made that require consultation.

4. Timetable for implementing this decision

Not applicable.

5. Comments from the Director of Finance and Resources and the Director of Law and Governance

5.1 **Financial implications**

There are no specific financial implications arising from the recommendations within this report.

5.2 **Legal implications**

There are no specific legal implications arising from this report. The issues referred to in this report will assist the Council in complying with its obligations under section 9F of the Local Government Act 2000.

6 Other implications

None.

6.1 How will this contribute to the One Coventry Plan?

Scrutiny work programmes prioritise items that contribute to the One Coventry Plan and the priorities within it.

6.2 How is risk being managed?

There is no direct risk to the organisation as a result of the recommendations in this report.

6.3 What is the impact on the organisation?

The role of Scrutiny is to hold the Executive to account and improve decision making. Scrutiny's impact is on improving existing policy, developing new policy and monitoring performance.

6.4 Equalities / EIA

There are no direct implications for equalities as a result of these recommendations, however all scrutiny items are considered for their health inequalities impact, as well as wider equalities impacts.

6.5 Implications for (or impact on) climate change and the environment

There are no direct implications for Climate Change as a result of these recommendations, however progress on the delivery of the Climate Change Strategy is subject to regular scrutiny.

6.6 Implications for partner organisations?

Scrutiny has powers to hold health partners and community safety partners to account, as well as require attendance and response to recommendations made. Scrutiny can also invite other organisations that deliver services to residents of Coventry, including the public, private and voluntary, social and community sectors. Several external organisations have been involved in the work of Scrutiny during 2024-25

Report author(s):

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Directorate: Law and Governance

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Enquiries should be directed to the above person.

Contributor/approver name	Title	Service Area	Date document sent out	Date response received or approved
Contributors:				
Suzanne Bennett	Governance Services Officer	Law and Governance	18/8/25	18/8/25
Elan Jones	Scrutiny Co-ordinator	Law and Governance	14/8/25	18/8/25
Adrian West	Head of Governance Services – Statutory Scrutiny Officer	Law and Governance	14/8/25	15/8/25
Names of approvers for submission: (officers and members)				
Finance: Phil Helm	Head of Finance – Financial Management	Finance	21/8/25	22/8/25
Legal: Julie Newman	Director of Law and Governance	Law and Governance	20/8/25	22/8/25
Councillor G Lloyd	Chair of Scrutiny Co-ordination Committee			12/8/25

This report is published on the council's website:

www.coventry.gov.uk/councilmeetings

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Appendix 1

Coventry City Council

Scrutiny Annual Report to Council

2024-25

To be considered at the City Council meeting
on the 2nd of September 2025

Introduction by Cllr Gavin Lloyd, Chair of Scrutiny Co-ordination Committee

Welcome to the Scrutiny Annual Report for the municipal year 2024-25. It contains a few highlights from the year, including cross-cutting themes, as well as work by the individual boards.

Firstly, I would like to thank Cllr Naeem Akhtar for all the work he has done in his role as Chair since 2021 - the scrutiny work he has led on in Coventry, as well as at the West Midlands Combined Authority has set a high bar for those that follow. I would also like to take this opportunity to thank Councillor Thomas for her work in chairing the Education and Children's Services Scrutiny Board and Councillor Kelly in her role as Deputy Chair of Scrutiny Co-ordination Committee during 2024-25 and welcome Councillor Kelly in her new role as the Chair of Education and Children's Services Scrutiny Board.

Scrutiny is an important part of the Council's democratic structure which is led by non-executive Councillors. It works to the common aim of improving services for the local community and is involved in the following:

- Policy review and development: Helping to shape the way public services are delivered.
- Scrutinising decisions of the executive: Is the right action being taken? Are services working effectively?
- External scrutiny: Examining services that impact upon the local community, such as health and policing.
- Scrutiny uses evidence to make recommendations to the Cabinet to request change; it does not make decisions.

The focus for scrutiny in 2025-26 will continue to be how we work with partners to sustain and improve services, particularly within the current economic and financial situation. This year the focus will be on impact and all scrutiny boards will undertake a task and finish group within their portfolio area to identify areas of improvement for Council services.

Get involved:

- Email the Scrutiny Chairs and Team via scrutiny@coventry.gov.uk
- Follow us on twitter @covscrutiny
- Find meeting dates and agendas here: Coventry City Council Meeting Papers

Scrutiny 2024-25

Scrutiny Co-ordination (SCRUCO)

Chair: Cllr G Lloyd
Deputy: Cllr Dr L Kelly

Scrutiny Coordination
Policy and Leadership
Policing and Equalities
Designated Crime and Disorder Board

Finance and Corporate Services (1)

Cllr A Jobbar

Strategic Finance
Transformation
Digital Strategy
Council Resources
New Ways of Working

Education and Children's Services (2)

Cllr CE Thomas

Early Help
Children & Young People's Social Care
Schools
Adult, Higher and Further Education
Libraries

Business, Economy and Enterprise (3)

Cllr R Singh

Business, Enterprise and Employment
Inward Investment
Transportation
Climate change and sustainability

Communities and Neighbourhoods (4)

Cllr M Ali

Public Services
Social Enterprise Strategy
Community and Third Sector
Homelessness
Housing
Arts and Heritage

Health and Social Care (5)

Cllr C Miks

Health
Adult Social Care
Health Inequalities
Sport

Scrutiny Board Highlights 2024-25

Scrutiny Co-ordination Committee

Pre-Decision Scrutiny

Scrutiny Co-ordination Committee focused on pre-decision scrutiny this year. There were several Cabinet reports which were considered by the committee before the executive made a final decision. Scrutiny Co-ordination Committee took the opportunity to look at the proposed decisions in more detail, questioning the relevant Cabinet Members and officers on the details provided in the reports. Reports that were subject to pre-decision this year were:

- LGA Peer Review Findings
- Proposed Consultation for the Community Safety Partnership Plan 2024-27 - additional recommendations
- Additional Licensing of HMO's
- Dog Control PSPO's
- One Coventry Performance Report
- City-wide PSPO
- Climate Change Strategy
- Temporary Accommodation
- Coventry Municipal Holdings Ltd – published accounts
- One Coventry Services Consultation

Strategic Energy Partnership

At their meeting on 20 November 2024, Scrutiny Co-ordination Committee considered a performance update of the Strategic Energy Partnership (SEP). The fifteen-year Strategic Energy Partnership between the Council and E.ON is the first of its kind in the UK and has the potential to put Coventry at the forefront of the net zero transition. The Council's relationship with E.ON will help support the development of ground-breaking projects, with potential funding from E.ON as well as other sources. The committee asked questions and received responses which identified, the importance of decarbonisation, but also the need to ensure that there is sufficient supply of energy to be affordable; that the benefits of the way the partnership was set up in Coventry was that it meant projects could be procured more quickly than if there was separate procurement processes for each individual project. Other benefits include legitimacy schemes supported by the Council have with residents; that there will be 2200 jobs created annually through the Energy Plan. The SEP was working with schools and colleges to promote apprenticeships within the sector, with a target of at least 25 in the first 5 years.

Coventry City Council / e·on Strategic Energy Partner

Finance and Corporate Services Scrutiny Board

Consultation on Spending, Saving and Council Tax Proposals for 2025/26

The Board considered a proposal for a three-week budget engagement process in October 2024 to help shape the December pre-budget report. The aim was to align budget planning more closely with the Council's One Coventry Plan by gathering public input on service priorities, without including specific financial proposals. A draft survey was to be widely promoted to increase participation, especially from diverse community groups. The Board endorsed the proposal, requested the addition of a socio-economic group question in the survey, and emphasised the importance of including Residents' Associations in its distribution.

During the Budget Consultation period, the Board reviewed a briefing on the City Council's public consultation regarding revenue spending, savings proposals, Council Tax, and the Adult Social Care precept for 2025/26. A seven-week consultation was approved by Cabinet, closing on 28th January 2025. The Board discussed financial settlements, proposed changes to the Council Tax Support Scheme, and equality impacts, including effects on care leavers and low-income households. They made several recommendations, including enhancing public awareness of discretionary support, reviewing the treatment of vulnerable groups, and evaluating the proposals' impact after 12 months.

Task and Finish Groups

Home to School Transport

The Board reviewed recommendations from the Home-to-School Transport Task & Finish Group, which emphasised the benefits of cross-service collaboration and the need for increased staff capacity to identify efficiencies. The Board supported continuing review of transport arrangements, sharing the Coventry model with the LGA, and exploring cost management strategies. They recommended replicating the collaborative approach in other Council areas, increasing use of in-house transport, and considering a fair incentive scheme for parents who transport their children. The Board will continue to monitor this in 2025/26.

Sickness Absence

The Board reviewed the findings of the Agency Staff and Staff Sickness Task and Finish Group, noting workplace changes and existing good practices in mental health support. Key suggestions included creating an internal agency staff pool and sharing best

practices across departments. The Board agreed to receive regular reports and recommended enhanced oversight and monitoring of staff sickness and agency usage by the Cabinet Member for Strategic Finance and Resources.

Education and Children's Services Scrutiny Board

Child Friendly Cov

At their meeting in October the Board considered a briefing note on Child Friendly Cov including the Safe Spaces programme that was being introduced in the city. The Board welcomed the work being delivered to make the city more child friendly and recommended to the Cabinet Member for Children and Young People:

- That consideration be given to other types of food outlets, including food hubs, and community centres and libraries being included in Safe Spaces
- That Home Educators be included and involved in all future work in this regard, particularly the survey
- That Secondary schools be further encouraged to participate and consideration be given to providing incentives to participate
- That consideration be given to licensed premises being included in Safe Spaces
- That the possibility of using the Child Friendly Cov logo as a "Kitemark" in schools be investigated
- That the engagement with Primary and Secondary Heads be welcomed and continued
- That consideration be given to participation in Local Democracy Week particularly visiting Parliament by members of the Pupil Parliament

The Board also received a link to the video promoting Safe Spaces. The Board will monitor progress on these recommendations during 2025/26.

Early Help

At their meeting in April, the board considered a report on Early Help, which looked in detail of the Early Help Strategy. Members of the board asked questions about health partners role in Early Help and heard that although health partners take an active role in the delivery of Early Help, there were no Lead Professionals from health. As a result, the Board recommend to the Cabinet Member for Children and Young People and the Cabinet Member for Public Health, Sport, and Wellbeing that health commissioners and providers ensure capacity within the service for more lead practitioner roles.

Business, Economy, and Enterprise Scrutiny Board

Economic Development Strategy/Skills Strategy at the Coventry Job Shop

The Board reviewed progress on the Skills and Economic Development Strategies. Key discussions on the Skills Strategy included graduate retention, careers advice benchmarking, job rotation models, NEET performance, and AI-related skills development. For the Economic Development Strategy, the Board explored business support, social value initiatives, energy efficiency audits, and the potential impact of the Investment Zone. The Board endorsed the report's recommendations and requested a follow-up progress report in 2025/26 focusing on benchmarking and graduate retention efforts. Following the meeting, members were led through a tour of the Job Shop facilities by officers.

Drone Technology

The Business, Economy and Enterprise Scrutiny Board received a briefing on Coventry City Council's involvement in drone technology projects. The Council has participated in several initiatives, including the Urban Air Port demonstration, Project Skyway, and the Drone Ready City project, showcasing drones' potential in areas such as traffic surveys, inspections, and medical supply transport. Benefits include cost reduction, efficiency gains, and lower emissions. The Board discussed regulatory, security, and operational considerations and supported continued use and integration of drones into Council services. Members requested updates on related projects and access to drone open data.

WMCA Bus Franchising Consultation

The Board reviewed a briefing on Transport for West Midlands' (TfWM) proposal to introduce a bus franchising system, which would shift control of routes, timetables, and standards from private operators to TfWM. A public consultation was underway between January to March 2025, with franchising potentially starting in Coventry by 2027 if approved in May 2025. The Board explored funding, operational standards, consultation outreach, integration with other transport modes, and service design. They supported the proposal and requested detailed feedback be submitted, including the need for broader consultation on user needs, evaluation of alternative transport modes, considerations for rural and vulnerable users, and raising public awareness. They emphasised achieving best value amid limited public funding. The Board will continue to

monitor progress of the WMCA Bus Franchising from a Coventry perspective throughout 2025/26.

Communities and Neighbourhoods Scrutiny Board

Severn Trent and site visit

For the first meeting of the year, the Board considered an item on Water Quality and received a briefing note and presentation from representatives from Severn Trent. The Board questioned the representatives on the investment programme, as well as the 5-year plan, as well as work to improve the health of the regions rivers and steps taken to reduce pollution.

Severn Trent Water presented their five-year plan, which involves a £65 million investment to mitigate flood risk and enhance water quality through Sustainable Drainage Systems (SUDS) The company aims to achieve carbon neutrality by 2030 and has committed to significant investments in environmental projects, including the restoration of rivers and enhancement of local habitats. The presentation emphasised the importance of community involvement in water management, with initiatives like the Get River Positive program and the establishment of River Rangers to foster local engagement. Board members raised questions regarding pollution areas, the relationship with the Canal and River Trust, and the impact of hard standing driveways on drainage systems.

In December the Board visited the Finham site to find out more about the process.

Impact of Budget Decisions

Several of the items considered by the Communities and Neighbourhoods Scrutiny Board were related to changes in service provisions as a result of budget decisions. The impact of the changes that the Board looked at were:

- Garden Waste
- Street Lighting
- Resident Parking Schemes

The Board looked at whether the proposed savings or income generation had been made, as well as whether there had been any unintended consequences. For the item on Street Lighting, the police attended and were able to provide assurances that there had not been an increase in crime or anti-social behaviour over the time that the part-night-time lighting had been implemented.

The Board requested further updates on the Garden Waste collection take-up for 25-26, including the new regulations on Food Waste which are due to be implemented.

The Board also noted that the scheme to standardise residents parking schemes had been fully implemented.

Health and Social Care Scrutiny Board

Visit to UHCW

The Health and Social Care Scrutiny Board (5) received a verbal update from the CEO of University Hospitals Coventry and Warwickshire (UHCW) on A&E waiting times amidst winter pressures, including increased cases of flu, COVID-19, norovirus, and respiratory issues in children. The Board discussed patient feedback, staffing, triage improvements, and service delivery challenges such as pharmacy closures, increased emergency care use during elective care waits, and rising mental health cases. Efforts to improve efficiency included automated pharmacy systems and AI tools. Safety measures like 24-hour security and body cameras were in place for staff. The Board noted the update and agreed to develop a briefing to explore better communication of UHCW services, including Virtual Beds, to Coventry residents.

Sports Strategy and visit to Alan Higgs Centre

The Health and Social Care Scrutiny Board reviewed Coventry's current Sport and Physical Activity Strategy and its upcoming refresh, set to be completed by 2025. The new strategy will combine the 2014-2024 Sports Strategy and 2019-2024 Physical Activity Framework. Achievements include a reduction in inactivity among older adults, increased active travel, and near-universal access to fitness facilities. Over £100 million has been invested in sports facilities, and Coventry was named European City of Sport in 2019.

The updated strategy will focus on reducing inactivity in specific groups through community programs, with an Equality Impact Assessment ensuring inclusivity. The Board requested more data on access to facilities, physical activity in those over 75, and walking buses for schools, and suggested considering transport links and local training opportunities to boost participation.

The Board supported the strategy's development, particularly in enhancing inclusion for older adults.

Scrutiny Recommendations Tracker 2024-25

The recommendation tracker covers recommendations scrutiny has made to Cabinet Members for the Municipal Year 2024-25.

SCRUCO

Meeting date	Report title	Recommendations to	Type	Recommendation / Action	Progress/outcome
11 April 2024	Parking Enforcement and Road Safety	Cabinet Member Policing and Equalities	Rec	1)That the Cabinet Member for Policing and Equalities be recommended to request that the Police take enforcement action in relation to parking on white zig zag lines	Briefing note sent to Cabinet Member 16/4/24
11 April 2024	Parking Enforcement and Road Safety	Cabinet Member for City Services	Rec	a)Considers the introduction of red routes on the parking hotspots of Foleshill Rd, Stoney Stanton Rd, Clay Lane and Longford Rd b)Reviews the parking restrictions in the city centre, including the Restricted Parking Zone, to ensure they are clear and consistent.	Briefing note sent to Cabinet Member 16/4/24
11 April 2024	Complaints Policy and Procedure Task and Finish Group		Rec	Recommendations to be submitted to the Cabinet Member for Finance and Strategic Resources	Scruco agreed to be Lead Member for Complaints as per LGSCO Guidance
10 June 2024	Local Government Association (LGA) Corporate Peer Challenge 2024 – Outcome of Peer Challenge	Cabinet	Rec	1 Supported the Recommendations to Cabinet and requested a further progress update after the LGA Peer Team's review and the subsequent LGA feedback report has been received. Briefing Note to be submitted to Cabinet – 11 June, 2024	Sent on 10th June
26 June 2024	Proposed Consultation for the Community Safety Partnership Plan 2024-2027	Cabinet	Rec	The Committee considered the report, supported the Recommendations detailed and made the following additional Recommendations to Cabinet:- 1)That the Cabinet request officers to use all of the Council's partners' communication channels, including faith groups and housing providers, to ensure as wide consultation as possible 2)That additional bullet points be added to Question 5 (relating to main priorities for the Community Safety Partnership to focus on) identifying i)environmental ASB – e.g. flytipping and dog fouling and ii) off-road e bikes	Briefing Note to be sent to Cabinet – 9 July, 2024 outlining the Committee's considerations and additional Recommendations . Approved on the 9th July

SCRUCO

Meeting date	Report title	Recommendations to	Type	Recommendation / Action	Progress/outcome
21 August 2024	Additional HMO Licensing Scheme 2025-2030	Cabinet	Rec	The Committee supported the Recommendations contained in the report	To be considered at Cabinet 27/8/24
21 August 2024	Proposed Renewal of the City-Wide Public Space Protection Order – Dog Control 2024-2027	Cabinet	Rec	The Committee supported the Recommendations contained in the report with the addition of: Cabinet is recommended to identify ways to raise the public's awareness of how to report their concerns about dog behaviour, such as signage on site with QR codes	To be considered at Cabinet 27/8/24
19 September 2024	Consultation Response to the Ministry of Housing, Communities and Local Government on Proposed Reforms to the National Planning Policy Framework	CM for Housing and Communities	Rec	1) Made a number of Recommendations in relation to the response to the consultation document, as detailed in the Briefing Note appended to this Action Note	BN sent and recommendations agreed at the CM meeting on the 20th September
19 September 2024	As above	CM for Housing and Communities	Rec	1) Recommended that the Cabinet Member for Housing and Communities request planning officers to arrange Members seminars and/or briefings on the review of the Local Plan ahead of consideration by Council in December 2024.	BN sent and recommendations agreed at the CM meeting on the 20th September
25 September 2024	One Coventry Plan Bi-Annual Performance Report (April 2023 – March 2024)	Cabinet	Rec	The Committee:- 1)Noted the Council's performance as set out in the performance report. 2)There were no comments/issues to raise with Cabinet.	Briefiing Note Sent to Cabinet on 27/09
25 September 2024	Proposed Creation of a City-Wide Public Spaces Protection Order (PSPO)	Cabinet	Rec	The Committee:- 1) Noted the report and the Addendum to Appendix 3 circulated at the meeting and had no comments or recommendations for Cabinet.	Briefiing Note Sent to Cabinet on 27/09
20 November 2024	Strategic Energy Partnership Performance Update - November 2024	Shareholders Panel	Rec	1)Recommendations approved 2)That Scrutiny Co-ordination Committee receive a further progress report during the Municipal Year 2024-25	Accepted at Shareholders Panel 21/11/24
20 November 2024	Coventry and Warwickshire Growth Hub Half-Year Report (Financial Year 2024/25)	Shareholders Panel	Rec	1)Recommendations approved 2)That future reports should be taken as public items	Accepted at Shareholders Panel 21/11/24
20 November 2024	UKBIC 6-Month Performance Report 2024/25	Shareholders Panel	Rec	Recommendations approved	Accepted at Shareholders Panel 21/11/24

SCRUCO

Meeting date	Report title	Recommendations to	Type	Recommendation / Action	Progress/outcome
20 November 2024	Coventry Municipal Holdings Limited Annual Performance Report Year Ended 31st March 2024	Shareholders Panel	Rec	1)Recommendations approved	Accepted at Shareholders Panel 21/11/24
21 January 2024	Consideration of Stage 2 Call- in – Binley Cycleway – Section 7 (Clifford Bridge Road)	The Scrutiny Co-ordination Committee accepted the original decision of the Cabinet Member for City Services	Rec	The decision can now be implemented	
06 March 2025	Local Government Association (LGA) Corporate Peer Challenge 2024 - Outcome of Progress Review	Cabinet	Rec	1)Supports the recommendations to Cabinet. 2)Had no further recommendations for Cabinet in relation to the outcome of the Progress Review	Briefing note included with Cabient papers on 10/3/25
06 March 2025	Coventry Municipal Holdings Limited - Accounts for the Year Ending 31st March 2024	Audit and Shareholder Panel	Rec	1)Notes the financial position as reported in the Annual Accounts for the Companies to 31st March 2023 and 31st March 2024. a) Had no further comments or recommendations for the Coventry Shareholder Committee arising from this meeting.	
06 March 2025	Artificial Intelligence	Cabinet Member for City Services	Rec	That there is a Fair Usage Policy developed.	Sent to Cabinet Member on 14/3/25. Agreed 17/3/25

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Meeting date	Report title	Recommendations to	Type	Recommendation / Action	Progress/outcome
08 January 2025	Consultation on Spending, Saving and Council Tax Proposals for 2025/26	Cabinet Member for Strategic Finance and Resources	Rec	Resolved that the Finance and Corporate Services Scrutiny Board (1): 1) Recommends that the Cabinet Member for Strategic Finance and Resources be requested to give consideration to how the public are made aware of the support that is available to them in respect of discretionary payment relief.	Sent to Clr Brown on 27th January
27 March 2025	Review Home-to-school Transport Task & Finish Group	Cabinet Members for Strategic Finance and Resources, Education and Skills and City Services	Rec	a. Replicate the model of working in other areas of the Council business, emphasising the value of bringing in people who don't directly work in the service to support those who do. b. Continue exploring ways to increase the number of children being moved by the Council's own transport rather than outside bodies and keep the procurement process under review. c. Investigate the possibility of creating a formula to incentivise parents to transport their children themselves, ensuring fairness and consistency.	Sent to CM's on the 1st April 2025. Cllr Sandhu has accepted the recommendations on 7/04
27 March 2025	Agency Staff and Staff Sickness Task and Finish Group	Cabinet Member for Strategic Finance and Resource	Rec	Recommend that the Cabinet Member for Strategic Finance and Resource considers a more formal oversight and monitoring of Staff Sickness and agency use	

Meeting date	Report title	Recommendations to	Type	Recommendation / Action	Progress/outcome
17th October 2024	Child Friendly Cov	Cabinet Member for Children and Young People	Rec	Requested that the following recommendations be forward to the Cabinet Member :- •That consideration be given to other types of food outlets, including food hubs, and community centres and libraries being included in Safe Spaces •That Home Educators be included and involved in all future work in this regard, particularly the survey •That Secondary schools be further encouraged to participate and consideration be given to providing incentives to participate •That consideration be given to licensed premises being included in Safe Spaces •That the possibility of using the Child Friendly Cov logo as a "Kitemark" in schools be investigated •That the engagement with Primary and Secondary Heads be welcomed and continued •That consideration be given to participation in Local Democracy Week particularly visiting Parliament by members of the Pupil Parliament	Sent on the 18th October
28 November 2024	Coventry Holiday Activities and Food Programme	CM Education and Skills	Rec	i.Make the case for continued funding in conjunction with Councillor Seaman. ii.Request the criteria for discretionary eligibility be considered to include home ed iii.Work alongside the Cabinet Member for Public Health and Sport and Wellbeing to identify potential funding from health partners to enhance the HAF programme.	Sent 12/12/24
13 March 2025	Early Help	Cabinet Member for Children & Young People and Public Health, Sport & Wellbeing	Rec	1)Recommend to the Cabinet Member for Children and Young People and the Cabinet Member for Public Health, Sport, and Wellbeing that health commissioners and providers ensure capacity within the service for more lead practitioner roles.	Sent 17/4/25
13 March 2025	Support for Care Leavers	Cabinet Member for Children & Young People andCabinet Member for Strat Finance & Resources	Rec	1)Recommend the Cabinet Member for Children's Services and the Cabinet Member for Strategic Finance and Resources consider raising the age of council tax exemptions for care leavers from 21 to 25	Sent 17/4/25

Meeting date	Report title	Recommendations to	Type	Recommendation / Action	Progress/outcome
26 September 2024	Coventry Transport Strategy Update	Cabinet	Rec	The Board recommended that Cabinet: 1)Agree the recommendations in the report. 2)Find opportunities to promote the innovative projects being delivered to support active travel in the city, such as VLR, Ring and Ride schemes and WM On Demand.	Recommendations went to Cabinet 1st October, Council 15th October
19 February 2025	Consultation on Bus Franchising Options		Rec	Resolved that the Business, Economy and Enterprise Scrutiny Board (3): 2) Requested that the following feedback be submitted to TfWM: i) Further consult the Local Authority on the operational assessment of the Network, subject to the WMCA Mayor's consideration of the franchising of the buses. ii) In addition to bus use, assess alternative modes of transport through the Bus Reform Panel iii) Investigate the bus pass validity of passengers who use mobility scooters, for use outside of the West Midlands Region	Officers will feedback through the CCC Consultation response to the Bus Franchising Consultation

Meeting date	Report title	Recommendations to	Type	Recommendation / Action	Progress/outcome
7th December	Supported Exempt Accommodation	CM for Housing and Communities	Rec	That the Cabinet Member for Housing and Communities be requested to explore introducing a quality charter to encourage providers to improve provision.	Sent to CM 12/1/24
5th September 2024	Homelessness and Rough Sleeping Strategy 2024- 29 Consultation	Cabinet Member for Housing and Communities	Rec	1)Agrees the priorities and themes within the new strategy. 2)Supports the draft strategy and the development of a Comprehensive action plan that will deliver the key priorities and themes3)How the Rough Sleeping Team will be resourced in the future, mainstream or grant funded, and how the risk of short-term funding will be mitigated	Briefing note to Cabinet Member
24 October 2024	Fly-tipping Performance 2023/24	Cabinet Member for City Services	Rec	1)The Cabinet Member for City Services is requested to look at ways to increase income to address fly-tipping including from businesses and private landlords.	Briefing note to Cabinet Member sent 18/11/24. Response received 19/11/24 "already working on it"
30 January 2025	Street Lighting	Cabinet Member for City Services	Rec	1)Supports the continuation of the part-night lighting.	Sent 4/2/25
30 January 2025	Street Lighting		Rec	2)Requests that any policy decisions on roll out and levels of LED lighting come to the Board before a decision is made	Sent 4/2/25
30 January 2025	Supported Exempt Accommodation	Cabinet Member for Housing and Communities	Rec	3)Requests the Cabinet Member ensures sufficient resources to enable the three posts created through the SHIP to continue beyond March 2025	Sent to Cabinet Member 4/2/25

SB 4

Meeting date	Report title	Recommendations to	Type	Recommendation / Action	Progress/outcome
30 January 2025	Supported Exempt Accommodation	Cabinet Member for Housing and Communities	Rec	4)Requests the Cabinet Member for Housing and Communities to consider the provision of information and the legal implications of the unnamed unapproved providers	Sent to Cabinet Member 4/2/25
13 March 2025	Conservation Areas	Cabinet Member for Housing and Communities	Rec	The Cabinet Member for Housing and Communities be requested consider funding prioritisation and allocation for heritage assets as part of the new Heritage Strategy.	Sent 20/8/25
13 March 2025	Food Waste	Cabinet Member for City Services	Rec	1) The communication strategy for the introduction of the food waste collection service is robust and emphasises the importance of the environmental benefits and potential cost savings, together with the importance of ensuring that garden waste is not contaminated with food waste 2) That consideration be given to the provision of food caddies as part of the introduction of the service	Briefing note sent 14/3/25 CM agreed 17/3/25
09 April 2025	Litter Picking	Cabinet Member for City Services	Rec	The Board recommended that the Cabinet Member give consideration to maintaining the one-off budget increase in 2025/26 of £420,000 for at least the next three years	Sent 18/4/25 - agreed by CM

Meeting date	Report title	Recommendations to	Type	Recommendation / Action	Progress/outcome
17th July 2024	Adult Social Care Market Position Statement Refresh	Cabinet Member for Adult Services	Rec	That the Market Position Statement for use with the Adult Social Care Market be agreed, with consideration made for encouraging local and not-for profit suppliers where appropriate.	Briefing note to be considered with Cabinet Member report at the meeting on 22/8/24. Accepted by CM on the 5th September
04 September 2024	Adult Social Care Performance – ASC Self-Assessment and Annual Report (Local Account) 2023/24	Cabinet	Rec	The Board considered the Adult Social Care Self-Assessment and Annual Report (Local Account) 2023/24.	Agreed at Cabinet on 1st October and Council on 15th Oct
04 September 2024	Adult Social Care Performance – ASC Self-Assessment and Annual Report (Local Account) 2023/24	Cabinet	Rec	The Board requested: Discharges for 2023/24 diagram (page 14) - clarification of the hospital discharge pathways.	Agreed at Cabinet on 1st October and Council on 15th Oct
13 November 2024	Health Sector Skills Development	Cabinet Member for Education and Skills and Cabinet Member for Jobs, Regeneration and Climate Change	Rec	1) Forward comments to the Cabinet Member for Education and Skills and the Cabinet Member for Jobs, Regeneration and Climate Change requesting feedback as follows: •How the ICB could visit schools to influence teachers, parents and children from an early age regarding children's future career paths. •Highlight and communicate that apprenticeships can be undertaken up to Masters level and open to all ages. •Barriers to recruitment and how these can be addressed.	BN Sent to Cllr Sandhu. Cllr Sandhu response to recommendation on 17/12 sent to SB5 members on 18/12
02 April 2025	The Sport and Physical Activity Refresh	CM Health and Sport	Rec	1. Access to sport facilities including transport links to be considered as part of the new Strategy.	Briefing Note sent 8th May 2025
02 April 2025	The Sport and Physical Activity Refresh	CM Health and Sport	Rec	1. Investigate the opportunity to draw external finance to train roles in sport, such as coaches and referees from the local community.	Briefing Note sent 8th May 2025

Agenda Item 10
Council – 2nd September 2025

Recommendation from Scrutiny Co-ordination Committee
21st August 2025

Coventry City Council
Minutes of the Meeting of Scrutiny Co-ordination Committee
held at 2.00 pm on Thursday, 21 August 2025

Present:

Members:	Councillor G Lloyd (Chair)
	Councillor M Ali Councillor A Jobbar Councillor L Kelly Councillor R Lakha (Substitute for Councillor R Singh) Councillor J Lepoidevin Councillor J McNicholas (Deputy Chair) Councillor G Ridley Councillor C Thomas (Substitute for Councillor C Miks)
Other Members:	Councillor E M Reeves (by Invitation)

Employees (by Service Area):

Chief Executive	J Nugent (Chief Executive)
Finance and Resources	B Hastie (Director of Finance and Resources)
Law and Governance	J Newman (Director of Law and Governance), G Holmes, L Knight
Planning and Performance	C Boden-Hatton (Director of Planning and Performance)
Apologies:	Councillors G Duggins, AS Khan, C Miks, R Singh

Public Business

13. **Declarations of Interest**

There were no disclosable pecuniary interests.

16. **Scrutiny Annual Report to Council 2024-2025**

The Scrutiny Co-ordination Committee received a Briefing Note of the Director of Law and Governance appended to which was the Scrutiny Annual Report 2024/25. The report detailed highlights from the year, including cross-cutting themes considered by the Committee as well as work undertaken by the individual Scrutiny Boards. The Constitution requires that Scrutiny report annually to inform Council of its work.

The Chair advised the Committee that he was proposing that the Scrutiny Recommendation Tracker be included within the published report in order for in order for recommendations made by the Scrutiny Boards to be shared with Council, along with the progress made.

The Scrutiny Co-ordination Committee agreed to:

1. Accept the content of the draft report at Appendix 1.

2. Request that the Scrutiny Recommendation Tracker be included within the published report so that requests made by Scrutiny Boards can be followed, along with progress made.

RESOLVED that, the Scrutiny Co-ordination Committee recommends that Council consider the Scrutiny Annual Report at its meeting on 2nd September 2025.

Coventry City Council

Public report
Cabinet

Cabinet 26th August 2025
Council 2nd September 2025

Name of Cabinet Member:
Cabinet Member for Housing and Communities – Councillor N Akhtar

Director approving submission of the report:
Director of Regeneration and Economy

Ward(s) affected:
All Wards

Title: Local Plan Review – Submission for Examination

Is this a key decision?

Yes - the proposals are likely to have a significant impact on residents or businesses in two or more electoral wards in the City

Executive summary:

On 14th January 2025, Council resolved to progress the Local Plan Review to 'Regulation 19' stage of publication, this being the final consultation stage in plan-making which precedes submission to the Secretary of State for examination.

The Local Plan has undertaken two formal consultation stages, these being at Regulation 18 and Regulation 19 stages, during which the Council received 1,719 comments from 930 respondents at Regulation 18 stage and 402 comments from 75 respondents at Regulation 19 stage.

Following the conclusion of the Regulation 19 publication on 3rd March 2025 a review of representations has been undertaken, alongside an advisory visit from the Planning Inspectorate. This report now seeks authority to submit the reviewed Coventry Local Plan for examination to the lanning Inspectorate, this being a mandatory stage of plan making which must take place prior to adoption. The decision to submit will have direct financial implications, including the costs charged to the authority by the Planning Inspectorate. Should the Plan then be found 'sound' by the Inspectorate, the Local Plan Review will return to Cabinet and Council for approval for formal adoption.

Recommendations:

Cabinet, having considered the response from the formal consultation, is requested to:

(1) Endorse the submission of the draft Coventry Local Plan at Appendix 1 – 5 together with relevant associated documentation for independent examination by the Secretary of State.

Cabinet, having considered the response from the formal consultation, is requested to recommend that Council:

(1) approve the submission of the draft Coventry Local Plan at Appendix 1 – 5 together with relevant associated documentation for independent examination by the Secretary of State.

(2) Directs that submission is accompanied by a request that the Inspector appointed to carry out the examination recommends any modifications necessary to make the Coventry Local Plan sound and legally compliant in accordance with Section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended).

(3) Delegate authority to the Director of Regeneration and Economy, following consultation with Cabinet Member for Housing and Communities, to take or authorise such steps as may be necessary for the independent examination of the Coventry Local Plan to be completed including but not limited to:

a) make appropriate arrangements for submission of the Coventry Local Plan and the completion and submission of all documents relating to the Coventry Local Plan;

b) Make all necessary arrangements for examination including:

- the appointment of a Programme Officer;
- the undertaking and/or commissioning of other work necessary to prepare for and participate at examination;
- proposing main and/or minor modifications to the Plan and/or modifications to the Policies Map;
- entering into Memorandums of Understanding and Statements of Common Ground; and
- the delegation to officers and other commissioned experts to prepare and submit evidence, representations and submissions to the examination and, where necessary, appear at any hearing sessions and represent the council; and

c) Iimplement any consequential actions relating to the examination, including undertaking any consultation that may be necessary, and

publishing the recommendations and reasons of the person appointed to carry out the examination. .

Council having considered the response from the formal consultation is recommended to:-

(1) Approve the submission of the draft Coventry Local Plan at Appendix 1 – 5 together with relevant associated documentation for independent examination by the Secretary of State.

(2) Directs that submission is accompanied by a request that the Inspector appointed to carry out the examination recommends any modifications necessary to make the Coventry Local Plan sound and legally compliant in accordance with Section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended).

(3) Delegate authority to the Director of Regeneration and Economy, following consultation with Cabinet Member for Housing and Communities, to take or authorise such steps as may be necessary for the independent examination of the Coventry Local Plan to be completed including but not limited to:

a) make appropriate arrangements for submission of the Coventry Local Plan and the completion and submission of all documents relating to the Coventry Local Plan;

b) Make all necessary arrangements for examination including:

- the appointment of a Programme Officer;
- the undertaking and/or commissioning of other work necessary to prepare for and participate at examination;
- proposing main and/or minor modifications to the Plan and/or modifications to the Policies Map;
- entering into Memorandums of Understanding and Statements of Common Ground; and
- the delegation to officers and other commissioned experts to prepare and submit evidence, representations and submissions to the examination and, where necessary, appear at any hearing sessions and represent the council; and

c) Implement any consequential actions relating to the examination, including undertaking any consultation that may be necessary, and publishing the recommendations and reasons of the person appointed to carry out the examination.

List of Appendices included:

The following appendices are attached to the report:

Appendix 1 – CCC Local Plan Regulation 19 (inc erratum statement)
Appendix 2 – CCC Local Plan Regulation 19 Appendices
Appendix 3 – Summary of key issues from Regulation 19
Appendix 4 – Current Housing Supply Trajectory (August 2025)
Appendix 5 – Sustainability Appraisal

Background papers:

- Adopted Local Plan 2017
- Adopted Coventry City Area Action Plan 2017
- Regulation 19 Reports to Cabinet and Council (10th December 2024 and 14th January 2025).
- Statement of Community Involvement July 2021
- Regulation 19 full responses – https://www.coventry.gov.uk/planning-policy/local-plan-review/4
- Background Papers and Evidence base available at : https://www.coventry.gov.uk/planning-policy/local-plan-review
- Local Development Scheme September 2025 (Cabinet 26th August 2025)

Has it or will it be considered by scrutiny?

The Local Plan review was presented to the Communities and Neighbourhoods Scrutiny Board (4) in September 2023 during the Regulation 18 stage to inform the ongoing development of the Plan, and further on the 18th December 2024 to inform upon the Regulation 19 stage.

Has it or will it be considered by any other council committee, advisory panel or other body?

Ongoing Member engagement has been undertaken through meetings of the Local Plan Advisory Group upon the formulation of the Plan prior to seeking authority for submission for examination, this included support of the recommendation of submission, presented to the Advisory Panel on the 2nd June 2025.

Will this report go to Council?

Yes – 2 September, 2025

Report title: Local Plan Review – Submission for Examination

1. Context (or background)

1.1 Local Plans should be considered for review at least once every five years, as laid out in Paragraph 33 of the National Planning Policy Framework and (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012).

1.2 As the Local Plan was adopted in December 2017, Council approved the commencement of a full review of the Local Plan on 6th December 2022 with the objective of ensuring policies are up to date, in line with changes to national policy and guidance, and that they continue to reflect local priorities. It should be noted that the Coventry City Area Action Plan, was adopted alongside the Local Plan, and this will be incorporated in this review. Therefore, all references to 'The Local Plan', 'The Plan' and 'Plan Review' incorporate both documents.

1.3 It should also be noted that the Government published a revision to the National Planning Policy Framework (NPPF), this revision to the NPPF has implications for the Local Plan Review process which are outlined later in this report.

1.4 Each policy in the 2017 Local Plan has been considered in turn in the context of current legislation and guidance and, where appropriate, updated evidence. The Reviewed Local Plan includes some polices that are unchanged from 2017, some with varying degrees of change and, where necessary, some new policies.

1.5 Consultation has been undertaken in line with the relevant regulations and the adopted Statement of Community Involvement to ensure that individuals, communities, stakeholders, and other organisations have ample opportunity to engage through a variety of means. The established planning policy database will directly notify those registered at the launch of the consultation.

1.6 Having completed the mandatory stages of consultation in Plan making, approval is now sought form Council to submit the reviewed Local Plan for examination with the Planning Inspectorate and delegate authority to the Director of Regeneration and Economy, following consultation to the Cabinet Member for Housing and Communities to make the necessary arrangements for examination including any modifications requested to the Plan during the examination period.

1.7 Further to examination and upon receipt of a report from the Planning Inspectorate that the Plan has been found to be 'sound', the Local Plan will return to Council for adoption.

2. Local Plan Review – Key Matters

2.1. The Regulation 19 Version of the full Local Plan has been produced further to earlier stages of consultation and engagement, and officers consider should be submitted to the Secretary of State for public examination. It therefore contains the information and detail that would be found in an adopted Local Plan.

2.2. The Regulation 19 Plan is informed by an up-to-date evidence base, which has been published in full alongside the Regulation 19 consultation. In the formulation of the reviewed Plan, officers and the Local Plan Advisory Panel have considered feedback from the Regulation 18 and Regulation 19 consultations, alongside the relevant expert evidence. The following paragraphs are a summary of the key matters contained in the reviewed Plan.

2.3 The Local Plan Review contains the following development targets for the 2021-2041 plan period:

- 29,100 dwellings;
- 60ha employment land;

2.4 The proposed development targets are informed by the 2022 Coventry and Warwickshire HEDNA (Housing and Economic Development Needs Assessment) and additional updated evidence.

2.5 Development that has already been completed in the 2021-2041 period counts towards these targets and therefore new allocations proposed within the plan are for the quantities of additional development required to achieve these overall targets.

2.6 The Local Plan Review does not propose any changes in respect of Greenbelt boundaries or designations. All newly proposed development allocations are on previously developed land and therefore in line with the Local Authorities 'brownfield first' approach to identifying development land. In pursuing an approach of 'brownfield first' and protection of the City's remaining areas of Greenbelt, the Regulation 19 Version also reviews the policy areas of development density and design. This approach is in alignment with National Governments priority for higher density development within urban areas, alongside locally embedding high quality standards upon design and internal living spaces.

2.7 The City of Coventry has a tightly-drawn administrative boundary and therefore development land is always in short supply. Through the allocation of brownfield development sites, the Council is able to identify land to meet the overall target of 29,100 dwellings. However, at this stage and notwithstanding a dedicated 'call for sites' being undertaken for employment land, identification of land to meet the overall employment land need has not been possible. The Council recognises the need to support the local economy and enable job creation and continues to work with our Duty to Cooperate partners to consider strategic options for meeting this need in the absence of suitable available sites within the city.

2.8 The Local Plan Advisory Panel has made clear the priority for the delivery of Social Rented housing and a suitable mix of house types to meet the needs of communities within the city. To the end, the policies proposed within the Reviewed Local Plan include the following changes:

- Reduced threshold for the provision of Affordable Housing on new development sites – any site over 10 dwellings should now provide Affordable Housing

- An increased proportion of Social Rented housing on all qualifying sites
- Adoption of Nationally Described Space Standards for all new housing developments

2.9 In respect of Climate Change, the Regulation 19 Plan includes new and revised policies seeking to reduce the negative environmental impacts of new development. These policies are proposed to surpass current Building Regulations requirements for both residential and non-residential new build requirements, and policies are included for the setting of new standards for developers to meet for on-site renewable energy generation, restrictions in the use of fossil fuels and improved thermal efficiency.

2.10 The Plan review has undertaken to develop policy to guide the highest possible quality of development throughout the city, this includes both the development of new policy standards, and also a review of the engagement of current policy in the past plan period. Where additional clarity has been identified as being required, or modifications to be responsive to market delivery this has also been incorporated into policy development.

2.11 There are several policy areas where the Council would have wished to set higher and more ambitious standards for new development to meet our wider aspirations for the city and its communities, however national planning guidance requires that the viability of development is considered when formulating local planning policy. To that end, the viability implications of the policy proposals within the Reviewed Local Plan have been fully assessed and have iteratively informed the policy detail. The Plan therefore seeks to deliver a balanced set of changes to policy that will enable development to sustainably meet the needs of the city.

3 Changes to the National Planning Policy Framework

3.1 In February 2025, the Government published a revised National Planning Policy Framework. This was inclusive of ‘transitional arrangements’ for Plan making to allow the progression of plans to submission which had been prepared under the previous NPPF.

3.2 Having undertaken the Regulation 19 stage of Plan making in January to March 2025, alongside the levels of housing requirement set out in the Plan being over 80% of the current Standard Method, the Plan satisfies the requirements of the transitional arrangements, and is able to continue its progression to examination, being tested under the December 2023 NPPF.

4 Technical Requirements

4.1 There is a wide range of statutory requirements that must be followed in the formulation of a Local Plan in order for it to be found legally compliant and sound by the Planning Inspectorate. Key amongst these is the process of Sustainability Appraisal and Strategic Environmental Assessment. This involves the assessment of all objectives and options considered in the formulation of the Local Plan against a range of sustainability objectives.

4.2. The Sustainability Appraisal has been published as part of the publication process and is contained at Appendix Five of this report.

4.3. Regulation 19 of the Town and Country Planning Regulations 2012 requires that all documents that are to be submitted to the Secretary of State must be made available for public inspection. The full evidence base that has informed the Local Plan Review has been published as part of the public consultation alongside background papers which have been prepared to articulate the policy proposals made.

4.4 Work with all statutory consultees and Duty to Cooperate Partners has been ongoing throughout the process of the Local Plan Review. Details are available within the evidence base and supporting documents, inclusive of an updated DtC statement to accompany the submitted plan.

4.5 Submission for examination also requires the appointment of an independent Programme Officer. The role of the Programme Officer is to act as a conduit for information sharing between the Council, Third Party representors and the Inspector . In anticipation of submission, officers have established a contract for this appointment which will be enacted upon submission.

5. Public Consultation on the Proposed Submission

5.1. Public consultation must be undertaken in line with the Town and Country Planning Regulations 2012, The Town and Country Planning (Assessment of Environmental Effects) Regulations 1988 and the Council's Statement of Community Involvement (SCI).

5.2. Two public consultations have been undertaken in preparation for submission, these being the 'issues and options consultation undertaken between July and September 2023, and consultation upon the proposed submission plan 'Regulation 19' held between 20th January and 3rd March 2025. The Council received 1,719 comments from 930 respondents at Regulation 18 stage and 402 comments from 75 respondents at Regulation 19 stage.

5.3 A summary of the main issues raised at the Regulation 19 stage is available at Appendix Three of this report. A detailed record of representations to the Regulation 19 consultation stage alongside proposed modifications to be presented to the Planning Inspectorate in response will be published on the Local Plan Review webpage upon submission.

6. Options considered and recommended proposal

6.1 Cabinet and Council could choose to not progress the Local Plan Review to submission for examination, however, this would not address the need to review the Local Plan or be in accordance with the Local Development Scheme (LDS) and as such this option is not recommended.

6.2 Cabinet and Council could choose to instruct officers to undertake a further consultation round ahead of submission for examination. However, this option would necessitate further costs being incurred of updating the evidence base and lengthen the plan period. This option would also not be in line with the process of the Local Plan Review outlined in the LDS and is therefore not recommended.

6.3 The Council could choose to approve submission for examination of the Plan and delegate authority to the Director of Regeneration and Economy to undertake any directed revisions and associated consultation to the plan. This option would align to the LDS and the recommendations of the Local Plan Advisory Panel.

The Local Plan will then return to Cabinet and Council for a decision upon adoption further to examination should the Plan be found 'sound' by the Inspectorate. This option is recommended.

7. Results of consultation undertaken

7.1 The consultation outcomes of the Regulation 19 stage are included at Appendix Three of this report.

8. Timetable for implementing this decision

8.1 The decision will be implemented at the earliest opportunity following approval.

9. Comments from the Director of Finance and Resources and the Director of Law and Governance

9.1 Financial Implications

9.1.1 The Local Plan Review must be supported by robust evidence, the costs of which are being managed within existing departmental budgets but have resulted in managed overspends as reported through regular budget reports. Costs of evidence base procurement to date have totalled circa £310,000 over several years from 2022 to 2025.

9.1.2 The recommendation of submission for examination carries further financial impact through the mandatory requirement to appoint a programme officer and the costs billed to the City Council by the Planning Inspectorate.

9.1.3 The most significant element of cost implication will be that charged to the City Council from the Planning Inspectorate, which may be anticipated to be in the region of £10,000 per month. The total cost of this phase of plan making is therefore dependent upon the time spent in examination. It is anticipated that these costs of examination may total in the region of £250,000.

9.1.4 Potentially there could be other additional costs, for example additional consultant costs may incur during the examination process. Therefore the total anticipated costs of examination could exceed the estimate shown above.

9.2 Legal Implications

9.2.1 The main legislation governing plan-making is found in the Planning and Compulsory Purchase Act 2004 ("the 2004 Act") and the Town and Country Planning (Local Planning) (England) Regulations 2012 ("the 2012 Regulations"). In accordance with Sections 19 and 20 of the 2004 Act, the council has a statutory duty to prepare planning policies and maintain an up-to-date development plan (this is further reinforced through the NPPF and Planning Practice Guidance). The draft Plan has therefore been prepared in compliance with primary legislation.

9.2.2 In preparing the Plan, it is considered that the council has complied with the statutory duty to co-operate and engaged with prescribed bodies, local communities and other stakeholders throughout the plan making process in accordance with its Statement of Community Involvement.

9.2.3 Reflecting on the entire process to date, it is considered that the council has discharged its functions in respect of Regulation 18 (Preparation of a local plan) and Regulation 19 (Publication of a local plan) of the 2012 Regulations. Representations relating to the draft Plan submitted at the Regulation 19 consultation stage have been duly recorded in accordance with Regulation 20.

9.2.4 The next stage of the process (if authorised by Cabinet and Council) is submission of the Plan to the Secretary of State for independent examination. By section 20(2) of the 2004 Act, the council can only submit the Plan for independent examination if:

(a) they have complied with any relevant requirements contained in the 2012 regulations; and

(b) they think the Plan is ready for independent examination.

9.2.5 It is considered that the council has complied with the relevant requirements in the Regulations and will continue to do so. As such, it is considered that there is no impediment to submitting the draft Plan and all supporting documents.

9.2.6 Once submitted to the Secretary of State, the draft Plan will be examined by an independent Inspector whose role is to consider compliance with section 20(5) of the 2004 Act, in essence whether the Plan is legally compliant and sound and whether the council has complied with the duty to cooperate. Under section 20(7C) of the 2004 Act, if formally requested by the council, the Inspector can recommend main modifications to the Plan if they are necessary to make it sound and/or legally compliant. As set out above, it is considered that the draft Plan is a sound and legally compliant plan (subject to any potential main modifications as discussed above) and that the council has complied with the duty to cooperate.

9.2.7 If the Plan passes the examination and is adopted, it will form part of the statutory development plan for the area and be used as such for the purpose of determining relevant planning applications and appeals.

Procurement Implications

9.2.8 The examination of the draft Coventry Local Plan will entail the need to procure the services of a suitably experienced Programme Officer to help support the appointed Inspector. The role of the Programme Officer is to act as a conduit for information sharing between the council, Third Party representors and the Inspector. The appointment of a Programme Officer is mandatory and as such, any contract to be put enacted shall be in accordance with the Council's procurement process and any associated legislative requirements.

10. Other implications

How will this contribute to the Council Plan

A reviewed Local Plan will enable the corporate priorities to be reflected as they are set out in the One Coventry Plan 2022 - 2030

How is risk being managed?

There is a risk that the reviewed policies could be found unsound by a Planning Inspector, however this is minimised by producing a thorough evidence base and having undertaken extensive consultation prior to submission of the Plan.

What is the impact on the organisation?

No direct impact from having additional planning policies.

Equalities / EIA?

A full Equality and Impact Assessment (EIA) has been undertaken as part of developing the Proposed Submission Local Plan and this has shaped policy preparation. As part of that analysis, the Council had due regard to its public sector equality duty under section 149 of the Equality Act (2010).

Implications for (or impact on) climate change and the environment?

The Proposed Submission Version contains new planning policies which seek to address the Councils' priorities for climate change. These policy areas have been informed by specialist evidence which has been jointly considered by CCC planning policy and climate change teams.

Implications for partner organisations?
None

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Contributor/approver name	Title	Service Area	Date doc sent out	Date response received or approved
Contributors:				
Suzanne Bennett	Government Services Officer	Law and Governance	18.07.2025	21.07.2025
Rob Back	Strategic Lead Planning	Regeneration and Economy	18.07.2025	25.07.2025
Xiao-Ming Hu	Lead Accountant, Business Partnering, City & Support Services	Finance	18.07.2025	28.07.2025
Names of approvers for submission: (officers and members)				
Ewan Dewar	Head of Service Finance	Finance	30.07.2025	30.07.2025
Oluremi Aremu	Head of Legal and Procurement Services	Law and Governance	18.07.2025	28.07.2025
Andy Williams	Director of Regeneration and Economy	-	18.07.2025	28.07.2025
Councillor N Akhtar	Cabinet Member for Housing and Communities	-	29.07.2025	30.07.2025

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Coventry City Council

Coventry Local Plan Review

Regulation 19 Proposed Submission

December 2024

Coventry City Council

Regulation 19 Proposed Submission

December 2024

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3. Housing Trajectory
4. Ancient Woodlands Map and List
5. Heritage Park and Route
6. Cycle and Parking Standards for New Development
7. Infrastructure Delivery Plan
8. Monitoring Framework
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a. Key Employment Sites
b. New / Amended Housing & Mixed Use Allocations

c. Affordable Housing Policy H6
d. City Centre Boundary & Transition Zone
e. Centres & Primary Shopping Areas
f. City Centre Character Areas

Abbreviations

Abbreviation	Full Term
AAP	Area Action Plan
AEP	Annual Exceedance Probability
AMR	Annual Monitoring Report
ANGST	Accessible Natural Greenspace Standards
BGS	British Geological Society
BNG	Biodiversity Net Gain
BREEAM	Building Research Establishment Environmental Assessment Method
BREDEM	Building Research Establishment Domestic Energy Model
CIBSE	Chartered Institution of Building Service Engineers
CQC	Care Quality Commission
DEFRA	Department for Environment, Food and Rural Affairs
DtC	Duty to Cooperate
ELR	Employment Land Review
FEMA	Functional Economic Market Area
FRA	Flood Risk Assessment
FWMA	Flood and Water Management Act
GTAA	Gypsy and Traveller Accommodation Assessment
HEDNA	Housing and Economic Development Needs Assessment
HELAA	Housing and Employment Land Availability Assessment
HEM	Home Energy Model
HER	Historic Environment Record
HIA	Heath Impact Assessment
HMA	Housing Market Area
HMOs	Homes in Multiple Occupation

IDP	Infrastructure Delivery Plan
ITS	Intelligent Transport Systems
JLR	Jaguar Land Rover
kWh	Kilowatt Hour
kWp	Kilowatt Peak
LAA	Local Aggregate Assessment
LCRM	Land Contamination Risk Management
LCWIP	Local Cycling and Walking Infrastructure Plan
LETCP	Low Emissions Towns and Cities programme
LLFA	Lead Local Flood Authority
LNR	Local Nature Reserve
LNRS	Local Nature Recovery Strategies
LPA	Local Planning Authority
LTP	Local Transport Plan
MCS	Microgeneration Certification Scheme
MVHR	Mechanical Ventilation with Heat Recovery
MSAs	Mineral Safeguarding Areas
NaCTSO	National Counter Terrorism Security Office
NDSS	Nationally Described Space Standards
NPPF	National Planning Policy Framework
ONS	Office for National Statistics
PBSA	Purpose Built Student Accommodation
PHPP	Passive House Planning Package
PSA	Primary Shopping Area
R&D	Research & Development
SABs	Sustainable Drainage Systems Approval Bodies
SAP	Standard Assessment Procedure
SBEM	Simplified Building Energy Model

SFRA	Strategic Flood Risk Assessment
SPD	Supplementary Planning Document
SSSIs	Sites of Special Scientific Interest
SuDS	Sustainable Drainage Systems
SUE	Sustainable Urban Extension
SWLP	South Warwickshire Local Plan
TER	Target Emissions Rate
TfWM	Transport for West Midlands
UTMC	Urban Traffic Management Control
WMCA	West Midlands Combined Authority
WMSESS	West Midlands Strategic Employment Sites Study

1. Introduction

1.1 The Local Plan covers the administrative area of Coventry City Council. It sets out where development will go, how much is needed and what kind of development we should provide for, as well as setting out what areas should be protected and improved. It must provide a balance between economic, social and environmental needs.

1.2 The policies which the Local Plan contains are used to help decide whether planning applications are acceptable or not. Some policies relate to specific areas and these are shown on the Policies Map. Other policies are criteria based and provide information to help with assessing planning applications.

1.3 The Local Plan needs to help deliver the vision, aims and objectives of Coventry City Council and these are set out in the One Coventry Plan. The One Coventry Plan focuses on the economy, skills and education, addressing the needs of an ageing population, addressing health inequalities, and dealing with environmental matters. Planning policies need to help deliver the aims and objectives of the One Coventry Plan.

1.4 The Local Plan is a statutory document and has to be prepared in accordance with legislation. It has been prepared under the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

1.5 The Local Plan and the accompanying Coventry City Area Action Plan were adopted by Coventry City Council on 6th December 2017. Councils are required to review their policies every five years to ensure that they remain up to date.

1.6 This is the process which has led to the production of this reviewed document. An initial consultation (Issues and Options) was undertaken from 18th July to 29th September 2023 to explore areas where it was felt the plan needed to be updated. A number of 'call for sites' consultations were also run, where the Council explored opportunities for accommodating its growth needs especially for housing and employment. The background to the Plan Review can be found here.

1.7 Taking into account consultation feedback alongside an updated evidence base, the Council has reviewed the policies of the Local Plan and Area Action Plan (AAP) to bring them up to date.

1.8 As this is a review and not a new Local Plan it is important that matters are kept proportionate. To ensure clarity and to avoid unnecessary duplication the Council is proposing to merge the Local Plan and the Area Action Plan into a

single document. In line with national legislation, some policies have now been identified as Strategic Policies: as set out in Planning Practice Guidance (March 2019) these are the ones that address the priorities for an area. Non-strategic policies deal with more detailed matters.

1.9 To help understand which policies have changed and why, the Council has produced a summary matrix to sit alongside this document. This shows the current adopted policy, proposed changes to the policy, any deleted or new policies and a short explanation. More detail is contained in a series of topic-based background papers. A Proposals Map has also been produced which shows how the current adopted Policies Map will change. A log of all reviewed policies from the Local Plan and Area Action Plan can be found in Appendix 1.

1.10 Local Plans must be prepared in line with **national legislation**. The new government which came into power in July 2024 is making a number of changes to the planning system. **However this plan is being progressed under the current transitional arrangements and is therefore being progressed in line with the National Planning Policy Framework (NPPF) December 2023** so as not to slow progress on work which was already very advanced.

1.11 Current legislation, The **Duty to Co-operate** (DtC), which was introduced through the Localism Act 2011 also requires the council to work closely and constructively with neighbouring authorities and a range of other organisations in addressing strategic issues.

1.12 The development of the plan is also informed by a Sustainability Appraisal, Habitats Regulations Assessment and Equalities and Health Impact Assessment.

1.13 Once this draft plan (the Regulation 19 Plan), along with its accompanying documents set out in paragraph 1.12, has been consulted on, it will be submitted for Examination in Public by an independent Planning Inspector who will take account of the comments received ('representations') as well as the evidence provided. More detail can be found here in terms of the process which must be followed.

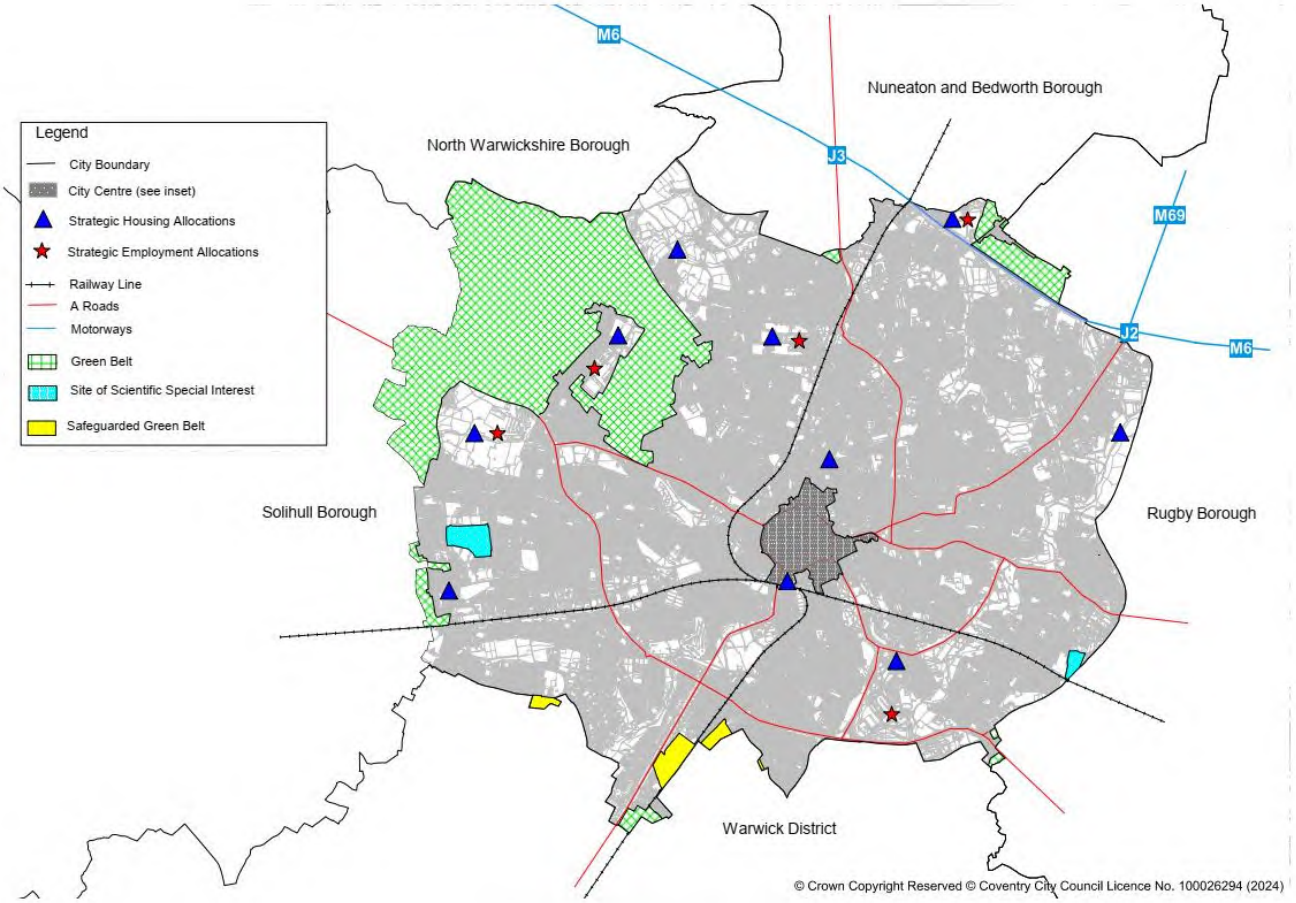
1.14 The current Local Plan runs up until 2031. The reviewed Local Plan will run up until 2041 as Local Plans need to cover at least a 15 year time period.

1.15 The geographical area which the Local Plan covers is shown in the diagram below, this relates to the area covered by Coventry City Council and for context also includes the detail of the neighbouring areas.

1.16 The Key Diagram below shows the administrative area of Coventry City Council (to which this Local Plan applies), the City Centre boundary, key geographical policies and infrastructure, and the context with the wider sub-region.

Map 1.1 Key diagram

The Key Diagram is a map showing how Coventry relates to the surrounding area, and the main policy designations.



2. The Vision

2.1 The One Coventry Plan (2022 – 2030) sets out the following Vision:

One Coventry - working together to improve our city and the lives of those who live, work and study here.

We will create:

- a city with a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow and new local jobs are created.
- a city where our residents get the best possible start in life, experience good health and age well, in a city that embraces diversity, protects the most vulnerable and values its residents and communities.
- a city, that leads the way and invests in the green industrial revolution. Ensuring the future well-being of our residents by embedding environmentally friendly behaviours and exploring opportunities to lessen the pressures caused by climate change.

2.2 The Vision includes three interconnected priorities:

- Increasing the economic prosperity of the city and region.
- Improving outcomes and tackling inequalities within our communities.
- Tackling the causes and consequences of climate change.

2.3 The table below sets out how the Local Plan can help deliver the vision and priorities of the One Coventry Plan, with the key objectives column extracted from the detail of the One Coventry Plan list of commitments for each priority, where applicable to the planning system.

Table 2.1 Delivering the One Coventry Plan

Priority	Key objectives	Key Local Plan policy references
Increasing the economic prosperity of the city and region Developing and building on the strength of our city's economy to deliver inclusive growth, supporting businesses to	Working with the existing businesses in the city to grow and expand, creating new jobs and becoming more resilient to fluctuations in the economy. Working to secure new inward investment in the city, businesses looking to grow and expand in the UK. Marketing Coventry as an attractive place to invest and create new jobs. When delivering projects across the city we will, where possible, prioritise jobs and skills for local people, use local small businesses and source	Strategic growth policies DS1-4 Economic policies JE1-7 Housing policies H1-13

innovate, grow and scale up. Capitalising on the green technological revolution to create more local jobs.	materials as locally as possible to try to ensure inward investment into the local area. We will create a sustainable, inclusive transport infrastructure, attracting businesses to invest. This will focus on a substantially improved public transport network, an environment that is much more suited to walking and cycling and harnessing transport links at the forefront of innovation. Continuing to improve the city and develop projects that enable local neighbourhoods to play their part in our economic success. Working with registered providers, charities, and community organisations to deliver more social housing for those who need it most. We will explore options around community-led housing projects, putting meaningful community involvement at the heart of new housing development. We will continue to ensure our city centre remains clean and tidy and offers a diverse range of experiences for residents and visitors to enjoy. By ensuring a high standard of city centre we will continue to attract investment and development making the city a liveable, green and safe place to thrive.	Retail policies R1-6 Green and Blue Infrastructure policies GE1 – 4 Design polices DE1-2 Heritage and Conservation Policies HE1-3 Transport policies AC1-7 Infrastructure policy IM1
Improving outcomes and tackling inequalities within our communities Focusing on improving outcomes for local people and tackling inequalities in order to build prosperity across the city, protecting the most vulnerable and supporting and valuing the	Effectively delivering the essential services that matter most to our communities. Strengthening our Marmot City approach to ensure it remains at the heart of what we do. Working with NHS partners to encourage healthy lifestyles and provide quality healthcare to all communities across the city. Working with business, residents, partners, and education providers to ensure that all our communities' benefit from job opportunities created by investment in the city. Tackling inequalities through a collaborative approach, with our residents, communities,	Strategic growth policies DS1-4 Health Policy HW1 Economic policies JE1 & JE7 Housing policies H1 – H13

contribution of our residents.	and partner organisations and through alignment with our Health and Wellbeing Strategy. Addressing the needs of those on low incomes with affordable access to quality housing, heating, and insulation. Protecting children and supporting families to give children the best start in life. Improving social, emotional, and mental health and well-being of our residents by enabling people to live independently where possible. Supporting our most vulnerable – including people who are street homeless, experiencing mental ill health and the integration of our refugee and migrant communities.	Community policies CO1-3 Green & Blue Infrastructure Policies GE1 – GE4 Design Policies DE1-2 Transport Policies AC1, AC4, AC5, AC6 Environmental Management policies EM1, EM4, EM7, EM11, EM13, EM15 Infrastructure policy IM1
Tackling the causes and consequences of climate change Having a relentless focus on tackling the causes of climate change and mitigating the inevitable consequences of this, to ensure the well-being of our residents and position Coventry as a leader and pioneer of the green industrial revolution.	<u>Low Emission Development</u> Investing in the development of technology solutions with businesses, universities, and partners to increase the adoption of new efficient, zero carbon renewable energy generation technologies. Promoting and supporting inward investment of zero carbon technologies in making the city a global market leader in a clean and green transport e.g., Very Light Rail and encouraging residents, communities, and businesses to take up active and green forms of travel. Encouraging green behaviours from everyone that lives, works or visits the city, and working with schools to implement sustainability into the curriculum in a holistic way.	Sustainable development policy DS3 Health policy HW1 Employment policies JE1 - JE7 Housing policies H1 – H13 Community policies CO1-3

A Climate Change strategy is being prepared by the Council and its partners to address these issues in more detail.	<u>Nature-based Development</u> Promote biodiversity and the natural heritage and greenspace across the city. Protecting and developing existing and new biodiversity and habitats for current and future generations. Ensuring that we protect wildlife, communicate awareness and engage communities and developers on the conservation of natural habitats. <u>Equitable and People-centered Development</u> Address inequalities exacerbated by the effects of climate change such as unemployment, fuel and food poverty, air quality and access to open space with associated impacts on health and wellbeing. <u>Resilient Development</u> Address the impacts and consequences of Climate Change by ensuring we have the right infrastructure in place to cope with the effects of extreme weather events such as flooding and extreme heat. <u>Circular Economic Development</u> Actively support businesses, schools, and partners in the minimisation of waste and the development of a circular economy which moves away from the traditional business model of consumption production and disposal to extending the life of products, re-use, and recycling.	Green Belt policies GB1-2 and Local Green Space Policy LGS1 Green and Blue Infrastructure Policies GE1-4 Design policies DE1 – 2 Transport Policies AC1, AC4, AC5, AC6, AC7 Environmental Management Policies EM1 and EM4 – EM15 Infrastructure Policy IM1

2.4 It is essential that the Local Plan is prepared in a way which delivers sustainable development and supports the Council's journey to net zero. The National Planning Policy Framework (NPPF), within Local Plans must be prepared, sets out that there are three overarching objectives:

- an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and
- by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

2.5 The plan review takes into account the above context, alongside the need to consider changes to national planning policy and guidance and other relevant policy and guidance. These are detailed in the separate chapters of the plan which address different themes.

3. Overall Levels of Growth and the Duty to Co-operate

Key evidence:

Housing and Economic Development Needs Assessment (2022)

Review of Coventry's Local Housing Need (2024)

Employment Land Review and Office Market Addendum (2024)

West Midlands Strategic Employment Sites Study (2024) and Coventry and Warwickshire Alignment Paper (2024)

Growth and Duty to Co-operate Background papers (2024)

Overall profile: summary

3.1 Coventry City Council's website provides a detailed profile about the city (which also includes mapped data) and this is a summary of the key issues. The city has a relatively young, and growing, population which is increasingly ethnically diverse. Deprivation is an issue in some neighbourhoods and whilst the situation is improving there are particular issues and challenges relating to social inequalities. More children in Coventry live in low income families than the national average.

3.2 Economically, the city has particular strengths in advanced manufacturing and engineering; energy and low carbon; connected autonomous vehicles; business, professional and financial services; and digital, creative, and gaming. However, despite resilience in terms of spending and other economic activity, Brexit, the Covid-19 Pandemic and the recent cost of living crisis, have all had significant impacts on households and businesses.

3.3 In terms of housing and the environment, the 2021 Coventry Household survey showed a general satisfaction of the area as a place to live. As a result of the compact nature of the city, most people live within walking distance of a range of services and facilities including open and green spaces. However there are significant areas of deprivation where access to services, facilities and open space are poor, pollution levels are higher and this reflects in higher levels of dissatisfaction. In addition, housing stock is typically small and old, with just under two thirds having being built before the early 1950s. Many homes are damp and poorly insulated, and expensive to heat. Poor overall health and wellbeing is a particular challenge in the deprived areas of Coventry where life expectancy is shorter and of poorer quality.

Growth needs

3.4 The Local Plan needs to ensure that housing and employment growth is managed in a sustainable way to ensure that it is also addressing environmental and social priorities including the delivery of infrastructure.

3.5 Planning for housing and economic needs is informed by the Housing and Economic Development Needs Assessment (HEDNA). This key piece of evidence has been produced jointly by Coventry and the Warwickshire Local Authorities of Nuneaton and Bedworth, North Warwickshire, Stratford on Avon, Warwick and Rugby because geographically they share a common Housing Market Area (HMA) and a Functional Economic Market Area (FEMA) i.e. their housing and economic circumstances are closely related.

Housing Need

3.6 In terms of housing, the NPPF (December 2023) sets out in Paragraph 61 that strategic policies should be informed by a local housing need assessment, conducted using the standard method which is an 'advisory starting point'. However, it goes on to explain that there may be exceptional circumstances, including those relating to particular demographic characteristics.

3.7 In Coventry's case, the Coventry and Warwickshire HEDNA found that there had been notable issues with the Office for National Statistics (ONS) population estimates for Coventry with the 2021 Census indicating that population had been significantly over-estimated. It was concluded that exceptional circumstances existed to deviate from the Standard Method for assessing local housing need because the basis upon which the Standard Method was based utilised erroneous data (the 2014-based Household Projections).

3.8 Given that new data had emerged since the production of the HEDNA in 2022, Coventry City Council commissioned an update in relation to its own housing need (Review of Coventry's Local Housing Need June 2024). This concluded that the HEDNA remained a reliable basis for plan-making.

3.9 The Local Housing Need for Coventry for the period 2021-2041 is therefore 29,100 (1,455 per annum) and this will be delivered fully within Coventry's administrative area through an urban and brownfield-focused strategy of allocations and densification as set out in the Housing chapter of this reviewed plan.

Employment Land Needs

3.10 In terms of employment, the HEDNA provides the starting point for the overall amount of employment which is needed over the plan period and this covers the Coventry and Warwickshire area.

3.11 However alongside this, work has been undertaken across the wider West Midlands region to understand the needs of large scale warehousing and logistics industries, the 'big box' units which are an increasing part of the economy both locally and nationally and which need sites of 25 hectares and above to function effectively (subject also to locational requirements). The West Midlands Strategic Employment Sites Study (WMSESS) 2024 has therefore been jointly produced by several Local Authorities across this area to guide this work.

3.12 Because the HEDNA was produced before the WMSESS, the Coventry and Warwickshire authorities jointly commissioned an 'Alignment Paper' (September 2024) to ensure all evidence was consistent, and up to date in terms of need, supply and any residual need (ie any remaining need which each of the Coventry and Warwickshire authorities would need to plan for).

3.13 Further detailed evidence has been prepared in terms of the Employment Land Review (ELR) and Office Market Addendum in terms of how employment need should be planned for, and this includes allocations and the identification of key sites as set out in the Employment chapter. Office needs have been assessed to understand further detail about the quantum needed and changing demand for space and flexibility, given altered patterns of working especially post-pandemic where hybrid working and use of technology is now commonplace.

3.14 In terms of office need, Coventry City Council is able to accommodate this, primarily but not exclusively within a revised Friargate allocation. In regard to local employment need (use classes E(g) (iii), B2 and B8), the City Council is able to accommodate 60 hectares of employment need, with a remaining shortfall of 45 ha which it is not able to accommodate within its own boundaries.

3.15 The above is for local need. In terms of a contribution to the wider strategic need, one allocation meets this, Baginton Fields, which is 25 hectares in size. Ongoing work is continuing with partners under the Duty to Co-operate to work collaboratively and constructively to address strategic need as, being a constrained area, no further opportunities are available in Coventry.

STRATEGIC POLICY

Policy DS1: Overall Development Needs

1. Over the Plan period 2021-2041 significant levels of housing and employment will be planned for and provided along with supporting infrastructure and environmental enhancements:-

a. A minimum of 29,100 additional homes.

b. A minimum of 60 ha of employment land to meet local needs within the city's administrative boundary, including:

i. the continued expansion of Whitley Business Park; and

ii. 15ha strategic allocation adjoining the A45 as part of the Eastern Green sustainable urban extension (SUE).

c. 25 ha, to be provided at Baginton Fields, to contribute to sub regional need in Coventry and Warwickshire

2. A minimum of 41,200 sqm overall office provision to include 39,549 sqm of office floor space at Friargate in compliance with Friargate Allocation JE2:1 with the remainder delivered in compliance with the criteria set out in Policy JE4

3. Notwithstanding the above, Coventry's employment need for the period 2021 to 2041 is for 105 ha of employment land (including qualitative replacements). It is not possible to deliver all of this additional development land within the city boundary. As such, the Council will continue to work proactively with neighbouring Councils through the Duty to Cooperate to ensure that appropriate provision is made elsewhere within the Functional Economic Market Area.

4. The Council will undertake a comprehensive review of national policy, the regional context, updates to the evidence base and monitoring data within 5 years of the date of adoption of the plan to assess whether a full or partial review of the Plan is required. In the event that a review is required, work on that review will commence immediately.

Furthermore, the Plan will be reviewed (either wholly or partially) prior to the end of the Plan Period in the event of one or more of the following circumstances arising: -

a. Through the Duty to Co-operate, the unmet employment needs of the city are proven to be undeliverable within the Local Plans of Warwickshire authorities;

b. Updated evidence or changes to national policy suggest that the overall development strategy should be significantly changed;

c. The monitoring of the Local Plan (in line with the Plan's Monitoring Framework having particular regard to the monitoring of housing delivery) demonstrates that the overall development strategy or the policies are not delivering the Local Plan's objectives and requirements;

d. Any other reasons that render the Plan, or part of it, significantly out of date.

The Duty to Co-operate

3.16 The Duty to Co-operate (DtC) is a legal test that requires co-operation between local planning authorities and other public bodies to maximise effectiveness of policies for strategic matters in Local Plans. It was created by the Localism Act 2011. Further details are set out in the Duty to Co-operate Paper

STRATEGIC POLICY

Policy DS2: The Duty to Co-operate and partnership working

1. Coventry City Council will work with neighbouring authorities within its Housing Market Area to support the delivery of the development needs identified in Policy DS1 that originate from the city.
2. In order to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities to secure opportunities for Coventry citizens to access affordable homes within Warwickshire where they are delivered as part of the city's wider housing needs being met.
3. The Council will support the preparation of joint strategic evidence which will enable the successful delivery of regeneration and economic growth across the sub-region. The Council will continue to be proactive in this regard and will seek to cooperate with all partners on an ongoing basis across all topic areas including housing, infrastructure, economy and jobs, transport, health and the environment.
4. Should the need arise and should it be considered appropriate the Council is committed to working with partners on preparing joint development plan documents, Supplementary Planning Documents (SPD) and design guides to help deliver new sustainable development that may straddle or adjoin the city's administrative boundary.
5. Where sites cross or are adjacent to administrative boundaries and are not subject to joint development plan documents, the Council will continue to work proactively and on an on-going basis with all relevant partners to enable the delivery of new development on these sites.
6. Of particular relevance to parts 4 and 5 of this policy is the continued support for and recognition of the contribution which the following sites make to the sub-regional economy:
   a. Jaguar Land Rover at Whitley;
   b. The University of Warwick;
   c. The wider Coventry Gateway proposals;
   d. Ansty Park;

e. Pro-Logis Park at Keresley; and

f. Proposed residential developments to the south of the city's administrative boundary.

7. The Council is committed to supporting the economic growth objectives of the sub-region and, in partnership will continue to work pro-actively with all partners to deliver economic growth and prosperity across Coventry and Warwickshire.

Delivering Sustainable Development

3.17 The Government expects the planning system to actively encourage growth, giving local people the opportunity to shape communities, whilst providing sufficient housing to meet local need and support economic activity. This approach is entirely consistent with the Council's vision and aspirations for Coventry. In this context, it is important that the planning system does everything possible to support economic growth and sustainable development.

3.18 The NPPF sets out the presumption in favour of sustainable development and the need for sustainable economic growth. Local Plans should reflect this presumption within their own policy base to promote sustainable development at the local level.

STRATEGIC POLICY

Policy DS3: Sustainable Development Policy

1. When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). It will work proactively with applicants to find solutions to enable proposals to be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area, taking into account the ambitions of the One Coventry Plan and the Climate Change Strategy and including:

a. access to a variety of high quality green and blue infrastructure;

b. access to job opportunities;

c. use of low carbon, renewable and energy efficient technologies;

d. the creation of mixed sustainable communities through a variety of dwelling types, sizes, tenures and range of community facilities

e. increased health, wellbeing and quality of life;

f. measures to adapt to the impacts of climate change;

g. access to sustainable modes of transport;

h. preservation and enhancement of the historic environment; and

i. sustainable waste management.

2. Planning applications that accord with the policies in the Coventry Local Plan (and, where relevant, with policies in supporting plans) will be approved without delay, unless material considerations indicate otherwise.

3. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise.

4. This will take into account:

a. Any adverse impacts of granting permission that would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or

b. Specific policies in that Framework that indicate that development should be restricted

Masterplan Principles

3.19 To support the delivery of sustainable development the importance of embedding a strong master planning framework within the Local Plan cannot be underestimated.

3.20 This policy, together with other relevant policies provides the master planning principles to guide and support landowners and developers in preparing appropriate master plans and site plans to help inform the Development Management process. It will provide an over-arching framework for the master planning of new development proposals.

3.21 Part A of this Policy provides a general context. Parts B-D relate specifically to the 3 specific allocations (Whitley, Keresley and Eastern Green) which the Council considers of significant strategic importance to the successful implementation of this Plan and its objectives. The Council considers these sites to be of sufficient scale to warrant comprehensive consideration through a master planning process.

3.22 To support this, planning conditions and Planning Obligations will be used in accordance with Policy IM1 to deliver necessary supporting infrastructure with trigger mechanisms and thresholds used to ensure timely provision. This will have regard to the requirements of this Local Plan as well as supporting evidence and modelling work provided as part of the planning application.

3.23 The infrastructure provisions contained within parts B-D of Policy DS4 and the supporting policies reflect the known requirements at this time. Future updates to the Infrastructure Delivery Plan (IDP) will allow such information to be

regularly updated to reflect prevailing circumstances and show more detail when it is known.

STRATEGIC POLICY

Policy DS4 (Part A) – General Masterplan principles

The following General Principles should be adhered to when master planning any major development proposal:

i. Where appropriate the Masterplan should clearly identify any phasing of development along with the timely provision of supporting infrastructure;

ii. Where the site is identified as an allocation within the Local Plan it should plan positively to meet in full the requirements identified within the relevant policies associated with the allocation. Where the proposal represents a phase or phases of a wider scheme however, the quantum of development should reflect the relative size and characteristics of the phase, including its position within the wider site;

iii. Where possible, all proposals should be planned in a comprehensive and integrated manner reflecting partnership working with relevant stakeholders. Where proposals represent a phase of a larger development the Masterplan should have full regard to any adjoining land parcels and development proposals to ensure it delivers appropriate parts of the strategic or site-wide infrastructure and other relevant features. This should support the wider delivery of the comprehensive scheme;

iv. Opportunities to deliver higher density residential and mixed-use development should be maximised along public transport corridors and in designated centres with lower densities provided elsewhere (in accordance with policies H9 and R3);

v. Employment and commercial proposals should respond positively to market demands and requirements, maximising opportunities to locate within or close to designated centres (as appropriate) and provide a range and choice of opportunities to meet business and customer needs;

vi. Identify appropriate highway infrastructure along with sustainable transport corridors that include the provision for integrated public transport, cycling and walking which provides excellent connectivity and linkages to within the site itself, the city centre and with the surrounding area and existing networks;

vii. Appropriate levels of car and cycle parking should be made in accordance with the Local Plan's parking requirements. Spaces should be well integrated

within the development and laid out to ensure they do not result in the obstruction of the highway as a result of excessive on-street parking;

viii. Where appropriate social and community facilities should be concentrated within mixed use hubs and designated centres and easily accessed by public transport, walking and cycling (having regard to Policy CO1);

ix. Proposals should respond to the local context and local design characteristics (in accordance with Policies GE3, HE2 and DE1), to create new well designed developments with a distinctive character which residents will be proud of;

x. Features of the historic environment should be respected as part of new developments with existing heritage assets conserved and enhanced as part of development proposals (in accordance with Policy HE2). Where appropriate, this should include the setting of buildings and spaces and the restoration of assets at risk of loss;

xi. Sympathetically integrate existing landscape, biodiversity and historic features of the site into the development taking opportunities to protect, enhance and manage important features along with mitigation and enhancement measures to provide satisfactory compensatory provisions where appropriate (having regard to Policies GE1-4);

xii. Provide fully integrated, accessible and connected multi-functional green and blue infrastructure which forms strategically important links to the surrounding area to provide routes for people and wildlife and open spaces for sports, recreation and play;

xiii. Where appropriate incorporate innovative and creative approaches to energy generation, the provision of utilities and information technology, mitigation of pollutants, management of surface water and flood risk and waste management solutions. These should be adopted to make new developments more sustainable and resistant to the impacts of climate change; and

xiv. All new Masterplans should be informed by consultation with existing communities in adjoining areas. This should take place prior to the submission of a planning application to ensure feedback can influence the final proposals.

3.24 As outlined above, Parts B-D of this policy relate to the following sites:

- The Whitley employment hub (including the future expansion of JLR);
- The Keresley SUE; and
- The Eastern Green SUE

These are considered to offer significant strategic importance to the successful delivery of the Local Plan and due to their size and nature will require a degree of comprehensive master planning.

Policy DS4 (Part B) - Whitley Specific Masterplan Principles

In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:

i. Any development should support and complement the existing JLR global headquarters;

ii. New provision should be primarily focused within 'B class' uses unless they are shown to be ancillary and supportive to the overall provisions of the business park and in accordance with the other policies of this Plan;

iii. Support and integrate the planned highway infrastructure (as listed in the IDP) across the A45, A444 and other appropriate surrounding roads to ensure efficient and appropriate vehicle access into the site(s);

iv. Continue to maximise links and connectivity with surrounding business parks within both Coventry City and Warwick District to enhance the employment hub;

v. Expand and enhance on existing travel plans and continue to encourage excellent connectivity to public transport as well as the provision of high quality routes to support both walking and cycling;

vi. Enhance the connectivity of ecology and biodiversity at the Stonebridge meadows Local Nature Reserve (LNR) and Baginton Fields nature reserve. This should include a 'green' connection into the River Sowe along the northern edge of the site and south of the A46;

vii. An appropriate buffer should be retained between the new commercial activity and the existing homes in and around Sedgemoor Road;

viii. Development should not compromise the presence and ecological value of the River Sowe and River Sherbourne; and

ix. Make positive provisions to relocate the existing sports fields (as appropriate) in accordance with Policy GE2;

3.25 Further to Part B of Policy DS4, further considerations may be of relevance to the wider Whitley Business Park in so far as it relates to land within Warwick District. Notwithstanding the extensive cooperation between Coventry City Council and Warwick District Council in relation to this area, it is not within the remit of this Local Plan to apply policy proposals to land outside of Coventry's administrative boundary

Policy DS4 (Part D) – Eastern Green SUE Specific Masterplan Principles

In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:

i. Incorporate the recommendations of the Council's SUE Design Guidance SPD;

ii. Respond to the transport and economic opportunities associated with the site's proximity to the planned HS2 interchange to the west.

iii. Ensure that the employment provisions and Major District Centre are located towards the north of the site and are accessed directly from the new A45 Junction. Neither the employment provision or new Major District Centre should be occupied until the new A45 junction is fully operational;

iv. Furthermore, the residential element of the scheme should be limited to the occupation of no more than 250 homes until such time as the new A45 junction is fully operational, unless otherwise agreed in writing by the Council in response to a robust TA.

v. Ensure the new defensible boundaries to the Green Belt are clearly supported to Pickford Green Lane in the west and the A45 to the north;

vi. Provide appropriate green infrastructure along the western edge of the SUE around Pickford Green Lane to help blend and integrate the development into the wider Countryside;

vii. Establish a comprehensive green and blue infrastructure corridor focused along the Pickford Brook and its tributary. This should run from Pickford Green Lane in the west and link to existing corridors off-site, for example, across Westridge Avenue and Parkhill Drive towards Allesley Park;

viii. Identify clear access points to the site and make appropriate provisions for new transport infrastructure and highway improvements to support the comprehensive delivery of the site;

ix. In accordance with Policy AC2, manage the existing highway junctions at Pickford Green Lane and Brick Hill Lane with the A45 to ensure they are either integrated into the new A45 Junction or safely retained within the existing highway network; and

x. Make appropriate provision to aid future integration of the new rapid transit route within the site once the final route is known.

4. Health and Wellbeing

Key Evidence

Coventry Joint Strategic Needs Assessment 2019

Coventry Health and Wellbeing Strategy 2023 -26

Indices of Multiple Deprivation

Health Background Paper 2024

Context

4.1 This chapter sets out the policy and guidance to support the health and wellbeing of Coventry's population over the plan period. It builds upon the NPPF's principle of achieving sustainable development and ensuring the health status and needs of the population are fully understood and taken into account as part of the development process. A key role of the Local Plan is to provide for development in a way that supports healthy and active lifestyles.

4.2 A healthy place is one which supports and promotes healthy behaviours and environments and a reduction in health inequalities for people of all ages. It will provide the community with opportunities to improve their physical and mental health, and support community engagement and wellbeing.

4.3 Poor health and wellbeing cannot be explained as arising by chance or genetics alone, increasingly the impact that the built environment has on health and health inequalities is being recognised. The places that people live in can have a direct and significant impact on peoples' health and wellbeing as the way that places are designed and constructed can have substantial effects on people's lifestyles.

4.4 Health and wellbeing are not consistent throughout the population, with health inequalities present across the population of Coventry. These inequalities can often be observed across small areas, with the differences in health and wellbeing throughout the population strongly correlated with levels of socio-economic deprivation. Economic, social and environmental conditions all influence health and wellbeing outcomes. Typically, those living in the most deprived areas experience worse health inequalities compared to those living in less deprived areas.

4.5 These were the findings of a review by Sir Michael Marmot (The Marmot Review, 2010) and as a result Coventry City Council was one of seven cities in the UK invited to participate in the UK Marmot Network, and it became a Marmot City in 2013. Addressing health inequality and health equity is therefore a key priority of the Council.

4.6 Using the Marmot Monitoring Tool, the Council actively seeks to address and improve the health and wellbeing of its population. It is therefore vital that health matters are an integral part of any development process.

4.7 Health Impact Assessments (HIAs) are useful tools in determining planning applications where there are expected to be significant impacts on health and wellbeing. They should be used to reduce adverse impacts and maximise positive impacts on health and wellbeing of the population as well as assessing the indirect implications for the wider community. HIAs are usually forward looking and can be carried out at any stage of the development process but are best undertaken as early as possible in the design process to ensure health matters are integrated at the outset.

4.8 Even for smaller applications health matters should be a consideration, and should be incorporated into the Design and Access Statement.

4.9 An updated Health SPD will be produced which provides guidance on producing Health Impact Assessments for major applications and a checklist to assist in factoring in health considerations for smaller applications, ensuring that matters addressed are proportionate to the nature and scale of the proposal.

4.10 Major development proposals in particular are more likely to have a significant impact in terms of health and wellbeing, which is recognised by national guidance. As such a HIA will be required to support developments defined as follows:

a. the use of land for mineral-working deposits;
b. waste development;
c. all forms of residential development where:
    i. the number of homes to be provided is 150 or more; or
    ii. the site area is 5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i)

d. all forms of urban development (not involving housing) where:
    i. the area of development exceeds 1ha; or
    ii. in the case of industrial development exceeds 5ha

STRATEGIC POLICY

Policy HW1: Health and Health Impact Assessments (HIA)

1. All major development proposals will be required to demonstrate that they would have an acceptable impact on health and wellbeing. This should be demonstrated through a:
    a. HIA where significant impacts on health and wellbeing would arise from that proposal; or
    b. HIA Screening Report which demonstrates that the proposed development would not overall give rise to negative impacts in respect of health and wellbeing.
2. All HIAs shall be undertaken in accordance with the Council's HIA Supplementary Planning Document or any future equivalent.
3. Where a development has significant negative or positive impacts on health and wellbeing the Council may require applicants to provide for the mitigation or provision of such impacts through planning conditions and/or financial/other developer contributions
4. Where the threshold has not been met for requiring a full HIA, for major applications of 10 dwellings or more, applicants will be required to demonstrate through their Design and Access Statements how they have taken health matters into account in line with principles contained in an updated Health SPD.

5. Jobs and Economy

Key evidence

Housing and Economic Development Needs Assessment (HEDNA) (2022)

Employment Land Review (ELR) (2024) and ELR Office Market Addendum (2024)

Housing and Employment Land Availability Assessment (HELAA) (2024)

West Midlands Strategic Employment Sites Study (WMSESS) and Coventry and Warwickshire Alignment Report (2024)

Coventry City Council Economic Development Strategy 2022-2027

Local Plan Review Employment Background Paper (2024)

Economic Opportunities and Challenges

5.1 Coventry City Council's administrative area sits within the wider economic sub region of Coventry and Warwickshire which forms the defined Functional Economic Market Area (FEMA).

5.2 The Council's Economic Development Strategy sets out the local context. In the 10 years after the 2008/09 recession, Coventry & Warwickshire was the fastest-growing local economy in England, driven significantly by major investments in Research & Development and production in the automotive sector and its supply chain, as well as continued expansion of the professional services sector and creative economy.

5.3 However, the local economy has encountered significant challenges in recent years. Growth slowed in 2018/19, and the COVID-19 pandemic had a severe impact on the local labour force. Longstanding inequalities across Coventry were exacerbated as a result.

5.4 Further challenges emerged in 2021 and 2022, with inflation (driven heavily by energy and component cost increases), labour shortages, and new regulations and document requirements for UK-EU trade post-Brexit all of which have slowed economic recovery. It is therefore crucial that Coventry can deliver a strong and sustainable recovery from this challenging economic climate, and that foundations are put in place for longer-term prosperity.

5.5 The Local Plan aims to help to deliver the key priorities of the Council's Economic Development Strategy which are:

- Focus on Advanced Manufacturing & Engineering: Emphasis on B2 floorspace and modern facilities to accommodate these sectors' requirements. Demand for skilled labour force within this sector.

- Promoting a Green City: Prioritising industrial innovation for sustainability through investment in sustainable transport to foster environmental consciousness.
- Cultural City with Expanded Creative & Tourism Sectors: Creative industries likely to require E(g) floorspace.
- Commitment to expanding creative and tourism sectors for cultural growth.
- High Employment Levels & Quality Jobs: Strong focus on creating employment opportunities with quality jobs.
- Opportunities for All through Education & Skills Ecosystems: Strengthening universities and education institutions to create opportunities for everyone.
- Addressing Inequalities: Aim to reduce health, economic, and social inequalities across the city.

5.6 The Coventry and Warwickshire HEDNA (2022) shows a strengthening local economy for Coventry with the key sectors being Education (13.1%), Health and Care (12.1%), Manufacturing (10.6%), Business Support Services (9.7%), Professional Services (7.6%) and Retail (7%). Coventry contains 39% of the study area's office stock, totalling 477,000 square metres, reflecting its position as a key commercial centre in the FEMA. Between 2011 and 2019 there was an increase of 26,700 jobs in Coventry.

5.7 However, as set out in the Employment Land Review (2024), exploration into Coventry's commercial markets reveals variances in vacancy rates and rental prices and data indicates a complex and changing landscape within the commercial market.

5.8 Furthermore, the HEDNA considered, at a high level, the impacts of the changed patterns of working especially relating to increases in hybrid and flexible working since the pandemic on office floorspace requirements. This was explored further through the ELR Office Market addendum, concluding that floorspace requirements in this sector could be reduced to respond to changes in the way the sector is now operating.

5.9 There are also particular challenges within the storage and distribution / logistics sectors as their demands and locational requirements have altered over time, including access to the strategic road and rail network and access to local markets and labour. This issue relates to ‘Strategic B8’, the ‘big box’ units of over 9,300 sq.m in size and strategic sites of 25 hectares and above. Because of the strategic nature of the challenges involved evidence (the WMSESS) was produced jointly by a number of authorities across the West Midlands area, and a more local ‘alignment paper’ was produced by the Coventry and Warwickshire local authorities to explain how this aligned with the HEDNA assessment of strategic B8 needs, which had been produced at an earlier date.

5.10 It is important that the location and provision of employment land is considered against future growth sectors and is able to adapt to changing needs of the various economic sectors over the plan period not just within Coventry but within the wider FEMA. This includes continuing to support the key sectors mentioned in paragraph 5.6 as well as supporting new and emerging sectors such as the growth in green industry, and working with our partners to ensure more strategic needs are met.

Definition of Employment

5.11 Defining 'employment' for the purposes of plan making and decision-taking is complex. The Use Classes Order was updated in 2020, therefore it is important to clarify that for the application of Local Plan Policy (and associated monitoring) this will relate to Class B2, B8 and E (g).

5.12 However, for the purposes of decision-making when considering planning applications it is recognised that outside of these use classes there are many other sectors which generate jobs, and therefore other uses serving an employment purpose will be taken into account in the planning balance.

STRATEGIC POLICY

Policy JE1: Overall Economy and Employment Strategy

1. In accordance with the One Coventry Plan, the Economic Development Strategy and the Climate Change Strategy the Council will work positively and proactively with the business community in the city, inward investors, the city's two Universities, key public sector employers, partners, and neighbouring local authorities to support sustainable economic growth and job creation. In this regard the Council will:

   a. Promote continued diversification of the city's economic base, particularly through supporting the expansion of companies operating in growth sectors particularly those relating to sustainable and green technologies, and through fostering partnership working with the city's Universities to promote innovation;

   b. Ensure that job opportunities arising from employment development are accessible to all of the city's working age residents, particularly priority groups and those in the most deprived areas of the city;

   c. Provide for a readily available range and choice of employment sites and premises to meet projected need over the Plan period related to growth of the city's population and the pivotal role of the city in the ambitious growth agenda for the sub-region;

d. There will be a presumption against the loss of employment uses, and change to non-employment uses will be assessed against the criteria set out in Policy JE3

e. Support companies, including Jaguar Land Rover, in retaining, expanding and/or relocating their headquarters operations within the city and support the provision of new infrastructure that encourages these companies to grow.

f. Seek to direct office development to locations in the city centre and other defined centres with new large scale office development focused on the city centre

g. Ensure that new research and development, light industrial, general industrial and storage/ distribution developments are appropriately sited and designed to maximise their accessibility by a choice of means of transport, have an acceptable impact on the highway network and to minimise the potential for environmental conflict with nearby sensitive land uses;

h. Support tourism/visitor related development including Coventry city centre, the CBS Arena and the Coventry and Warwick University Campuses.

i. Support the continued growth of the city's two universities and in doing so maximise the economic development and other community benefits associated with them.

j. Support the provision of new green infrastructure as part of new and improved developments

Provision of Employment Land and Premises

5.13 Employment land should be provided to meet the needs of all employment uses – offices, research and development, light/general industrial and storage/distribution. These uses have varying land requirements. Office occupiers tend to seek city centre locations, research and development occupiers often require sites with close links to the universities whilst industrial and storage/distribution occupiers prefer sites which have good access to the strategic highway network and are not constrained by their proximity to neighbouring sensitive land uses such as housing. Sites of varying size are also required to meet the needs of both large and small businesses.

5.14 The HEDNA (2022) along with the subsequent Alignment Paper (2024) sets out that for Coventry between 2021 and 2041 105 hectares of employment land (use Classes B2 and B8) is required. This does not include the strategic 'big box' need which is set out in the alignment paper as between 136 – 311 ha across the Coventry and Warwickshire sub region.

5.15 In addition the ELR Office Market Addendum (2024) establishes an indicative minimum need of 41,200 sq.m. office floorspace provision with a recommendation for flexibility to allow for the ability to respond to changing markets.

5.16 Table 5.1 below provides a summary of the employment land supply components for Class B2 and B8

Table 5.1 – Class B2 and B8 local employment land supply components for Coventry

Supply components	Site size (Ha)
Completions 2021 – 2024*	25.4
Committed supply	6.2
Remaining Allocations from adopted 2017 Local Plan carried forward (where not included above)**	28.6
Total	60.2

*Data up to 31 March 2024

**Includes 1.2ha at Austin Drive HELAA site. Excludes 25ha at Baginton Fields which is for strategic B8

5.17 Table 5.2 below provides a summary of the employment land supply components for office uses

Table 5.2 – office supply components for Coventry

Supply components	Site size (sqm)
Completions 2021 - 2024	22,299
Committed supply	24,940
Remaining Allocations from adopted 2017 Local Plan carried forward (where not included above)*	27,100
Total	74,339

* Friargate remaining as part of reconfigured mixed use calculations (see Friargate allocation)

5.18 In terms of office allocations Coventry is able to meet its own need, through a majority of provision through a reviewed Friargate allocation. Since 2021, Friargate has delivered 12,449 sq.m floor space at Friargate 2 (Friargate One was delivered prior to the start of the plan review period), and a further 27,100 sq m will be provided as part of the Friargate allocation. This totals 39,549 sq.m delivery at Friargate over the plan period, leaving a residual amount of around 1,650 sqm to be delivered in line with the approach set out in Policy JE4

5.19 In terms of remaining local employment needs excluding office provision 60 hectares for local need can be accommodated taking into account supply,

completions and allocations, leaving a residual need of 45 hectares. The city is unable to meet its need in full which has already been highlighted through Policy DS1 and reflects the importance of the Duty to Co-operate in ensuring the employment land needs of the sub region are met.

5.20 In terms of strategic employment the Baginton Fields (Policy JE2:4) allocation meets the 25 hectares and above criterion and is to be retained as an allocation to contribute to the wider strategic needs of the sub-region, and again the Council will work with partners to ensure strategic needs are met.

5.21 The Employment Land Review assessed Coventry's employment sites and concluded that a number of these were particularly important in maintaining a resilient and varied employment stock: these are designated as Key Employment Sites.

STRATEGIC POLICY

Policy JE2: Provision of Employment Land and Premises

1. A total of 52 ha of land is allocated for employment development within the city's administrative area, plus 27,100 sq m remaining floorspace at Friargate as part of a wider mixed use allocation. The allocations are as specified below together with details of the type of employment development that will be promoted on each of these sites.

Site ref	Site	Ward	Site area (as allocated (ha) in 2017 adopted plan)	Allocation (local Plan review) – area remaining (ha unless specified otherwise)	Comments
JE2:1	Friargate (part of mixed use scheme)	St Michaels	7	27,100 sq m office floorspace (part of mixed use development)	6.52ha remaining overall site area. Friargate 1 and 2 delivered.
JE2:2	Lyons Park	Bablake	19	0	Delivered
JE2:3	Whitley Business Park	Cheylesmore	30	6.46	Part delivered
JE2:4	Land at Baginton Fields and South East of Whitley Business Park	Cheylesmore	25	25	Application awaited
JE2:5	A45 Eastern Green (part of mixed use site)	Bablake	15	15	Outline application received
JE2:6	Whitmore Park (part of mixed use site)	Holbrook	8	2.89	Part delivered
JE2:7	Durbar Avenue (part of mixed use site)	Foleshill	1.5	1.5	Application awaited
JE2:8	Land at Aldermans Green Road and Sutton Stop (part of mixed use site)	Longford	1.5	1.5	Application awaited
	Total		**107ha**	**52.35 (excludes Friargate office floorspace figure)**	

2. The Friargate, A45 Eastern Green, Whitmore Park, Durbar Avenue and Alderman's Green Road and Sutton Stop employment allocations are to be progressed as part of wider mixed-use re-development schemes and should be supported by comprehensive Masterplans.

3. A balanced portfolio of employment land supply offering a choice of sites will be maintained, with details of need and supply set out in the Annual Monitoring

Report (AMR) and informed by the Employment Land Review which will be updated on a five yearly basis.

4. The following sites, shown at Appendix 9a and listed in bullet point 5, are designated as Key Employment Sites which will be protected for employment use. Alternative uses will not be considered acceptable unless exceptional circumstances demonstrate otherwise. In such cases it must be demonstrated that delivery of mixed use including retention of employment has been considered on the site. Only where this has been evidenced not to be viable or appropriate will policy JE3 and associated Appendix 2 be applicable.

5. Key Employment Sites are shown at Appendix 9a and are:

- Binley Business Park
- Coventry Business Park
- Cyan Park
- Lyons Park
- Swallowgate Business Park
- University of Warwick Science Park
- Whitley Business Park

Non-Employment Uses on Employment Land

5.22 It is essential that a sufficient amount and range of employment land is maintained throughout the city to ensure that the city's economy continues to grow and residents have access to job opportunities. This objective is achieved in part through the allocation of land in this Plan for employment purposes along with the designation of Key Employment Sites. This policy seeks to protect these allocated and designated sites from undesirable redevelopment or conversion for non-employment uses. It is also important to ensure that existing non-allocated employment sites are also retained for employment use wherever possible.

5.23 On those employment sites where this Policy applies the loss of such sites to non-employment use will not be permitted unless the exceptions criteria outlined in the Policy are satisfied.

5.24 Where it is considered that a site is no longer suitable for employment use the evidence of unsuccessful active and substantial marketing of the site using a variety of media will normally need to show that such marketing has taken place for a continuous period of at least 6 months, immediately prior to the submission of any planning application for non-employment use of the site. This marketing activity should be undertaken in accordance with Appendix 2 of the Local Plan.

Policy JE3: Non-Employment Uses on Employment Land

1. Sites designated as Key Employment Sites will firstly be assessed in accordance with Policy JE2
2. Proposals for the redevelopment in whole or in part of employment land for non-employment purposes will not be permitted unless it can be demonstrated that the part(s) of the site where non employment development is proposed are:
   a. No longer suitable for employment use bearing in mind their physical characteristics,
   b. access arrangements and/or relationship to neighbouring land-uses and there is evidence of unsuccessful active and substantial marketing of the site for employment use using a variety of media which supports this; or
   c. It would not be financially viable to re-use or re-develop the land or buildings on the land in whole or in part for employment purposes; or
   d. The non-employment development proposed would be used for purposes which are clearly ancillary to and will support the operations of a primary employment use on the land; or
   e. The non-employment development would generate significant employment gains which are of sufficient weight to justify the loss of employment land.
4. In addition to at least one of the above criteria being satisfied it will also need to be demonstrated that:
   a. The potential of the site to contribute to the employment land requirements of the city over the plan period is not significant; and
   b. The proposal would not significantly compromise the viability or deliverability of other adjacent employment land or land allocated in this Plan for employment development; and
   c. The proposal will not have an unacceptable adverse impact on the continuing operation of any nearby existing businesses.
5. Planning applications to which this Policy applies should be accompanied by written evidence to demonstrate that the proposed development satisfies the exceptions criteria highlighted above.
6. This Policy applies to land which is currently in use or was last used for employment purposes unless such land has been allocated in this Plan wholly for non-employment use.

Location and type of new office development

5.25 The NPPF defines office development as a main town centre use. Therefore the 'Sequential Test' applies and such development should normally be

accommodated within defined centres unless it can be demonstrated that there are no sites within such centres which are suitable and available to accommodate the proposed development. The NPPF and associated Planning Practice Guidance sets out how the sequential test should be applied.

5.26 The ELR Office Market Addendum recommends a continued focus of office development within the city centre. This includes the Friargate site but with some further flexibility to enable windfall office floorspace development to come forward in other sustainable locations outside the Friargate allocation site in line with the sequential approach set out in the NPPF. This is to encourage and support the provision of office stock, both new and refurbished, to respond to changing market needs in this sector. Similarly, office developments are encouraged to ensure their layouts are flexibly designed (eg to allow for reconfigured internal layouts) so that they can adapt to a range of potential users such as start ups, grow-on or small to medium enterprises.

Policy JE4: Location and type of Office Development

1. New office development (including change of use of buildings to provide office accommodation and the expansion of existing office uses) should normally be sited within Coventry city centre or other defined centres (as defined on the Policies Map).
2. The Friargate site within Coventry city centre is the Council's preferred location for new large scale office development.
3. Proposals for new office development in other locations will only be permitted if the following criteria are satisfied:
   - **a.** Having regard to locational factors, there are no suitable sequentially preferable sites available within the city centre, another defined centre or in an edge-of-centre location (if no Defined Centre sites are suitable and available); or
   - **b.** The proposal is for small scale rural offices;
4. In addition to at least one of the above criteria being satisfied it will also need to be demonstrated that:
   - **a.** The proposal would not have a significant adverse impact on the vitality and viability of defined centres and on existing, committed and planned public and private investment in office development within a defined centre; and
   - **b.** The site is accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development; and
   - **c.** There is good access from the development to a primary route on the highway network and and acceptable impact on the capacity of that network; and

d. The proposals are compatible with other Plan Policies.

5. Proposals for new office development outside of Defined Centres shall be accompanied by a Sequential Assessment.

6. New build offices, and conversions of premises to offices should be designed to allow for flexibility of internal layouts so that these can be altered to adapt to changing market conditions and the needs of users.

Location of Industrial and Storage / Distribution Development

5.27 The Council's preferred location for new industrial and storage/ distribution development are the various sites allocated for such purposes under Policy JE2.

5.28 Notwithstanding this, it is acknowledged that proposals may come forward on other non-allocated sites within the city for these uses. All industrial and storage/distribution developments on such sites should be accessible by a choice of means of transport, have an acceptable impact on the highway network and be compliant with other Plan Policies.

5.29 However, in addition it is acknowledged that significant environmental impacts can arise from general industrial and storage/distribution operations and therefore proposals for such development will also need to demonstrate that they would not result in significant harm to the amenities of persons occupying nearby residential property or other land occupied by uses sensitive to environmental pollution such as schools and hospitals.

5.30 The Council will also need to be satisfied that proposals on windfall sites would not compromise the viability or deliverability of land allocated in this Plan for employment development.

5.31 Given the nature and scale of the storage and distribution sector and its dependence upon road freight movements, in order to reduce impact on the road network and in line with the transport strategy, B8 uses will need to include HGV parking and overnight facilities. In addition, electric vehicle charging and consolidation facilities will need to be delivered. Freight consolidation is where many suppliers have goods delivered directly to a place (consolidation centre or delivery hub), where it is stored and then delivered to its final destination by means which have a reduced impact upon the local road network such as smaller more sustainable vehicles, or alternative delivery technologies, for example.

5.32 Overall the objective of Policy JE5 is to ensure that businesses can locate in the optimal location in terms of accessibility and minimising environmental conflicts whilst also providing residents with good access to a range of job

opportunities across the city and minimising impacts upon the environment, health and climate change.

Policy JE5: Industrial and Storage / Distribution Development

1. The Council's preferred location for new industrial and storage/distribution development are the sites allocated for such purposes under Policy JE2.
2. Proposals for new industrial and storage/distribution development (including changes of use and the expansion of existing operations) on sites not allocated under Policy JE2, will be permitted provided that they are:
   - **a.** Accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development;
   - **b.** Have good access to a primary route on the highway network and an acceptable impact on the capacity of that network;
   - **c.** Would not significantly compromise the viability or deliverability of l and allocated in this Plan for employment development;
   - **d.** Would be compatible with other Plan Policies.
3. In addition to the above, proposals for new general industrial and storage/distribution development (including changes of use and the expansion of existing operations) on all sites (including those allocated under Policy JE2) will also be required to demonstrate that the proposed development would not result in significant harm to the amenities of persons occupying nearby residential property or other land occupied by uses sensitive to environmental pollution.
4. In addition to the above, where B8 uses will include HGV parking and overnight facilities, electric vehicle charging and consolidation facilities.

Tourism / Visitor related development

5.33 According to Destination Coventry (2024) the tourism, leisure and hospitality sector, generates[1] over £750 million, supports circa 7,357 jobs, and attracts over 11 million visitors annually. The Council's Economic Development Strategy highlights the importance of tourism in delivering sustainable economic growth. This includes delivering physical enhancements to Coventry's culture and tourism assets to increase footfall, dwell times and spend and further build the city's reputation for hosting major national events and as a destination for leisure and tourism. The strategy states that central to achieving this objective will be the completion of the development of the Collections Centre as a focal point for arts and creative sectors, as well as realising the Arena Quarter

Masterplan which will be crucial to maximising the economic potential of the North East of the city.

5.34 Destination Coventry is a newly formed (2024) Destination Management Organisation and will take forward and develop the Coventry Tourism Strategy 2019-2023

5.35 Policy JE6 therefore seeks to support proposals for tourism/visitor related development in accordance with the Economic Development Strategy and the aims and objectives of Destination Coventry subject to compatibility with other Plan Policies. Tourism/visitor related development such as hotels, conference facilities and leisure/recreation schemes which are classified by the NPPF as Main Town Centre Uses will also need to satisfy the Sequential and, where appropriate, Impact Tests laid down in national guidance.

Policy JE6: Tourism/Visitor Related Development Proposals which would contribute towards the city's role as a tourist destination will be supported subject to compatibility with other Local Plan Policies.

Accessibility to Employment Opportunities

5.36 One of the key pillars of the Council's Economic Development Strategy is to support all Coventry residents to access jobs and develop skills. This will help support education and skills issues that restrict the labour market progression of both people in work and the unemployed (7.1% of Coventry's working-age population have no qualifications compared to 6.4% nationally). Any failure to match the local workforce's skills to employer's needs risks harming the economic recovery of key sectors. The Council has stated that it will continue to support local businesses to tackle challenges with recruitment and labour supply.

5.37 Moreover, those without work or who are low paid are vulnerable to poorer health and life expectancy, and the Council has committed to working with businesses to tackle longstanding health inequalities. The Council is therefore prioritising the upskilling and reskilling of the local workforce and ensuring local people access new jobs emerging. This strategy is fully integrated with the new Coventry Skills Strategy . Working with stakeholders the Council will encourage social responsibility in the development sector, and ensure the benefits of this are being realised well into the future within the city.

5.38 Furthermore the Economic Development Strategy seeks to encourage the development and growth of social enterprises across a range of sectors, and boost their capacity to tackle social and environmental needs and provide training and job opportunities.

Policy JE7: Accessibility to Employment Opportunities

1. Planning applications for new employment development (including changes of use and the expansion of existing operations) will be required to demonstrate how job opportunities arising from the proposed development will be made accessible to the city's residents, particularly those in the most deprived areas of the city and priority groups. In this regard applicants will be expected to give consideration to a range of measures including:
   - **a.** enhancement of the accessibility of the development to residents by a choice of means of transport;
   - **b.** developments must be well designed to accommodate the needs of all transport modes and must be fully integrated with existing transport networks;
   - **c.** the provision of support to residents in applying for jobs arising from the development;
   - **d.** the provision of training opportunities to assist residents in accessing employment opportunities;
   - **e.** childcare provision which enables residents to access employment opportunities; and/or
   - **f.** measures to assist those with physical or mental health disabilities to access employment opportunities.
2. In respect of planning applications for new employment development the Council may require applicants to make developer contributions to maximise the accessibility of job opportunities to the city's residents.

Location of Research and Development (R&D)

5.39 The Council's preferred location for new Research & Development (R&D), development are the various sites allocated for such purposes under Policy JE2.Notwithstanding this, it is acknowledged that proposals may come forward on other non-allocated sites within the city for these uses. All R&D developments on such sites should be accessible by a choice of means of transport, have an acceptable impact on the highway network and be compliant with other Plan Policies.

5.40 The R&D sector is closely linked to the work of the local universities and its culture of innovation and enterprise, and it is important that this is supported in order to grow and evolve the economy. The Economic Development Strategy seeks to encourage 'creators, designers and makers' to work alongside homegrown talent to shape new industries and technologies, as well as attracting, retaining and growing new and better jobs that will drive the city's future.

5.41 Coventry's strong history of innovation and first-class support ecosystem means the city is well placed to lead the way in delivering a "Green Industrial Revolution", given that it produces the fourth highest number of patents per head of all major UK cities (75.6 per 100k population), and R&D will play a key role in delivering new green industrial technologies.

Policy JE8: Location of Research and Development (R&D)

1. The Council's preferred location for new Research & Development (R&D), are the sites allocated under Policy JE2.
2. However, proposals for new R&D, (including changes of use and the expansion of existing operations) on sites not allocated under Policy JE2, will be permitted provided that they are:
   - **a.** Accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development;
   - **b.** Have good access to a primary route on the highway network and an acceptable impact on the capacity of that network;
   - **c.** The proposal would not significantly compromise the viability or deliverability of land allocated in this Plan for employment development;
   - **d.** The development is compatible with other Plan Policies.

6. Delivering Coventry's Housing Needs

Key evidence

Housing and Economic Development Needs Assessment (2022)

Review of Coventry's Local Housing Need (2024)

Housing and Economic Land Availability Assessment (2024)

Gypsy and Traveller Accommodation Assessment (2023)

Viability Assessment (2024)

Density Study (2024)

Purpose Built Student Accommodation Market Study (2024)

Authorities Monitoring Reports

Coventry City Council Housing and Homelessness Strategy 2019 - 2024

Coventry City Council Homefinder data

Housing Background Paper

The Housing Market in Coventry

6.1 Since 2011, the Authorities Monitoring Reports show strong performance overall of housing delivery against the Local Plan requirement. The 2022/3 monitoring year showed cumulative delivery of 24.6% above the Local Plan requirement of 14,200 at this stage in the projection.

6.2 Monitoring shows an increasing number of family homes (3 bedrooms and larger) being completed as a result of the Strategic Urban Extensions (SUEs) starting to be delivered. However, recent monitoring has also shown a significant spike in the delivery of Purpose Built Student Accommodation (PBSA) and the conversion of a number of dwellings to Homes in Multiple Occupation (HMOs). In regard to HMOs these are now being regulated via an Article 4 Direction and a Homes in Multiple Occupation Development Plan Document.

6.3 The HEDNA sets out details of market conditions across the Coventry and Warwickshire Housing Market Area (HMA). Overall house price growth has been stronger than the regional and national average since 2013, but the pattern is varied across the sub region, with Coventry, along with North Warwickshire, Nuneaton and Bedworth and Stratford on Avon displaying slightly weaker growth in recent years when compared to the West Midlands region. Rugby and Warwick show stronger growth during the same period.

6.4 In terms of house prices, however, Coventry, along with North Warwickshire and Nuneaton and Bedworth have lower than the national average values.

6.5 In regard to sales, across the HMA overall there is a balance between terraced, semi detached and detached stock, for Coventry 76% of sales in 2020 were either terraced or semi-detached homes. Sales of flats were highest in Warwick (18%) followed by Coventry (12%). When location and value were considered together, sales of properties under £200,000 were focused particularly in Coventry. This reflects the choice of stock available at that point in time and the situation can be expected to change now that the strategic urban extensions allocated through the 2017 plan are progressing.

6.6 The HEDNA also highlights the importance of the availability of mortgage products for first time buyers across the HMA: a combination of rising house prices and limited availability of mortgages with higher loan-to value ratios has been restricting first time buyer numbers.

6.7 In terms of the lettings market, the HEDNA shows Coventry to have higher median rents than the regional average (2021) but lower than the national average. However, in the HMA since 2018 relative growth in rents has been consistently stronger in Coventry (albeit median rates remaining below Stratford on Avon and Warwick). There is a clear need for rental properties with the HEDNA identifying that demand is outstripping supply, in Coventry this is particularly for 2 and 3 bedroom properties.

6.8 In terms of the Council's Housing and Homelessness Strategy, the Local Plan can help to deliver its key priorities: Preventing Homelessness and Supporting Homeless Households; Support for People and Communities; Improving the Use of Existing Homes; Housing Development. Addressing a variety of needs requires a varied housing stock and this chapter explores this in more detail.

Scale of Housing Development

6.9 The joint Coventry and Warwickshire HEDNA (2022) and the Coventry update Paper 'Review of Coventry's Housing Need' (2024) confirms that exceptional circumstances exist to justify applying an alternative approach to the national Standard Method for determining housing need. This is in accordance with the NPPF (December 2023 paragraph 61).

6.10 The HEDNA identifies a local housing need of 1,455 per annum over the plan period, 29,100 in total. Following a thorough consideration of sustainable development principles and in accordance with the NPPF, an assessment of land options through the Call for Sites and the HELAA and a density study informing a strategy of increased densification a capacity of around 31,954 homes has been identified, which provides a degree of flexibility above the local need figure of 29,100. Table 6.1 below identifies the Council's housing land supply and sets out how the requirement will be met.

Table 6.1 Components of housing supply 2021-2041

Housing Land Supply Components (data to 30/9/24)	Number of Homes
Past net completions	7,666
Committed supply	13,975
Remaining allocations (2017 Local Plan)	2,733
Proposed new site allocations (local plan review)	3,503
Other identified sites (HELAA)	816
Windfall allowance	2,800
Total	**31,493**

6.11 The trajectory contained in Appendix 3 shows how development will be delivered over the plan period.

STRATEGIC POLICY

Policy H1: Housing Land Requirements

1. Provisions will be made for a minimum of 29,100 additional dwellings between 2021 and 2041.
2. The housing requirement is to be delivered in line with the trajectory set out in Appendix 3
3. Housing land will be released in order to maintain a continuous 5 year supply of housing land in order to support a varied and flexible land supply to support housing delivery and sustainable development. This will be monitored through the Council's Annual Monitoring Report.

6.12 The identified land supply will offer flexibility and choice across the city. The following policy, accompanied by Table 6.2 sets out the allocations referred to in the Components of Housing Supply Table 6.1 above. As this is a review of the adopted 2017 Local Plan a commentary is also provided so it can be seen where the 2017 Local Plan allocations are underway or where they have been delivered, and those allocation reference numbers remain unchanged for clarity. New / amended allocation maps are at Appendix 9b.

STRATEGIC POLICY

Policy H2: Housing Allocations

1. Table 6.2 identifies the sites to be allocated for housing development alongside essential details that will support the principles of sustainable development. The development of all sites will also need to be considered in accordance with other policies in this Local Plan (and supporting documents) and the Infrastructure Delivery Plan, with the infrastructure needs of each site to be secured through legal agreements and developer contributions where appropriate.

2. The urban extension proposals at Keresley and Eastern Green are to be brought forward in full accordance with comprehensive Masterplans and in accordance with the Council's Urban Extension Design Guidance SPD.

Table 6.2 - Site Allocations for Housing

Site Ref	Site	Ward	Total Dwellings	GF / PDL	Essential Site Specific Requirements and Other Uses	HELAA Ref.
H2:1	Keresley SUE	Bablake	3,100	GF	Retail space within a local centre in the south of the site (policy R1). Distributor link road connecting Long Lane and Winding House Lane to be fully operational prior to the full completion of the SUE. Surrounding junction improvements as appropriate and identified through a robust TA. Provision of 2FE primary school and contributions towards a 8FE secondary school. Retention of medieval fishponds, ancient woodlands, important (ancient) hedgerows. Creation of publicly accessible green corridor along the Hall Brook and enhanced connectivity between the ancient woodlands. Protection of Jubilee Woodland. Inclusion of appropriate screening to existing residential areas.	
H2:2	Eastern Green SUE	Bablake	2,250	GF	15ha of employment land adjacent to the A45 (policy JE2), which is to be developed in tandem with the residential development. The provision of a new Major District Centre and a Local Centre (policy R1). Provision of 2FE primary school. New grade separated junction from the A45 to provide primary site access with surrounding junction improvements as appropriate. The new A45 junction should be fully operational prior to the occupation of the employment land and the Major District Centre, whilst no more than 250 homes should be occupied prior to this junction being fully operational (in accordance with Policy DS4D). Creation of publicly accessible green corridors along the Pickford Brook and its tributaries. Retention of medieval moat at Pond Farm and retention of important hedgerows. Inclusion of appropriate screening to existing residential areas. Buffering and screening at Pickford Green to protect the transition of land use into the wider Green Belt.	
H2:3	Walsgrave Hill Farm	Henley and Wyken	900	GF	Retention and enhanced setting of listed buildings at Hungerley Hall Farm. Site to incorporate blue light access linking the A46 to the University Hospital. Facilitate and work with Highways England on highways proposals linked to a new Grade Separated junction at Clifford Bridge. Provision of essential drainage and flood risk infrastructure.	HE002-24

H2:4	Land at Whitmore Park, Holbrook Lane	Holbrook	730	PDL	As part of mixed use scheme to deliver 8ha of redeveloped employment land (policy JE2). The retention of the sports field fronting Beake Avenue. Highway works to open up Swallow Road to public traffic as appropriate. Retention of locally listed building facades and boundary walls.	
H2:5	Paragon Park	Foleshill	700		2017 Local Plan allocation, **now delivered.**	
H2:6	Land at Browns Lane	Bablake	475	GF	Retention of important trees and hedgerows. Need to focus primary access to Coundon Wedge Drive.	
H2:7	Land at Sutton Stop	Longford	285	GF	Total Allocation is linked to extant permission (FUL/2013/0727) and should also include a 225 berth marina and ancillary provisions (as appropriate) and 1.5ha of employment land (policy JE2). The site should also incorporate in excess of 5ha publicly accessible green space and the inclusion of appropriate screening to existing residential areas. Development will need to ensure that highways access and provisions are adequate and suitable for the site. This could include remodelling of the junction at Sutton Stop and Grange Road and at Alderman's Green Road	
H2:8	Land West of Cromwell Lane	Westwood	240	GF	Creation of woodland area to the western boundary of the site to reflect Ancient Arden landscape characteristics and ensure defensible boundary to the wider Green Belt. Retain and enhance the setting of Westwood Farm and other listed buildings within and adjacent to the site. Inclusion of appropriate screening to existing residential areas. Explore opportunities to introduce residents parking schemes on site and along adjoining streets with surrounding junction improvements as appropriate.	
H2:9	Land at London Road/ Allard Way	Binley and Willenhall	200	GF	Retention and reuse of locally listed pumping station and lodge. Retention of important hedgerows and management of biodiversity/ ecology impacts. The provision of at least 2.5ha of publicly accessible green space as part of the development.	
H2:10	Former Lyng Hall playing fields	Upper Stoke	185	mix	Provision of 1ha of publicly accessible green space as part of development. 2017 Local Plan allocation, **now delivered.**	
H2:11	Elms Farm	Henley	150	GF	Creation of publicly accessible green space along eastern boundary of site.	
H2:12	Site of LTI Factory, Holyhead Road	Sherbourne	110	PDL		
H2:13	Grange Farm	Longford	105	GF	Retention of important hedgerows. Highway improvements to Grange Road. 2017 Local Plan allocation, **now delivered.**	

H2:14	Former Transco site, Abbots Lane	Sherbourne	100	PDL	Retention of sandstone boundary walls.	
H2:15	Land at Sandy Lane	Radford	250	PDL	Retention of the Daimler Office building on Sandy Lane.	R004-24
H2:16	Land at Carlton Road / Old Church Road	Foleshill	85	PDL	Retention of chimney, art-deco façade and railings of former weaving mill.	
H2:17	Nursery Sites, Browns Lane	Bablake	80	GF	2017 Local Plan allocation, **now delivered.**	
H2:18	Former Mercia sports field	Foleshill	75	GF/ PDL	Provision of 0.5ha of publicly accessible green space as part of development. 2017 Local Plan allocation, **now delivered.**	
H2:19	Land at Mitchell Avenue	Wainbody	50	GF	Existing sports facilities are to be re-provided at the site of the former Alderman Harris School at Charter Avenue or an appropriate alternative site within the local area as part of this development (in accordance with policy GE2).	
H2:20	Land at Durbar Avenue	Foleshill	45	PDL	As part of mixed use scheme to deliver 1.5ha of redeveloped employment land (policy JE2).	
H2:21	Woodfield school site, Stoneleigh Road	Wainbody	30	mix	New homes to link in with new railway station to be delivered as part of the wider NUCKLE project (policy AC6).	
H2:22	Land at the Junction of Jardine Crescent and Jobs Lane	Woodlands	25	PDL	Retail space within extended district centre (policy R1).	
H2:23	Land west of Cryfield Heights, Gibbet Hill	Wainbody	20	GF	2017 Local Plan allocation, **now delivered.**	
H2:24	Land West of Cheltenham Croft	Henley	15	GF		
H2:25	The Grange Children's Home, Waste Lane	Bablake	15	PDL/ GF	Locally Listed buildings to be retained and converted with limited new build allowed to support a comprehensive scheme. Dense tree boundaries to be retained to protect wider Green Belt setting.	
H2:26	Coventry Central Police Station, Little Park Street	St Michael's	600	PDL	Development needs to be sensitive to View Cones 8: Mile Lane and 10: Quinton Rd, as defined in the Tall Buildings Design Guide and the Three Spires View Management Framework SPD.	STM009-24
H2:27	New Union Street Car Park	St Michael's	170	PDL	Development needs to be sensitive to View Cone 9: Mile Lane (Christ Church) as defined in the Tall Buildings Design Guide and the Three Spires View Management Framework SPD.	STM011-24

H2:28	New Gate Court Business Park, Paradise Street	St Michael's	303	PDL	Consented application for mixed use commercial and high rise flatted (C3) development FUL/2022/2635. Site to retain and enhance the Old City Wall Scheduled Ancient Monument (SAM) and may be required to divert a gas pipeline running through it.	STM001-23
H2:29	Former Vintage House, St Nicolas Street / Leicester Row	Radford	100	PDL	Development needs to be sensitive to the character of the Coventry Canal Conservation Area that it is located in.	R003-23
H2:30	Whitefriars Street Car Park	St Michael's	185	PDL	Development needs to be sensitive to View Cone 7: Parkside, as defined in the Tall Buildings Design Guide and the Three Spires View Management Framework SPD.	STM012-24
H2:31	Paybody Building, Stoney Stanton Road	Foleshill	280	PDL	Existing NHS health facility within the city centre boundary that is likely to become available for residential or healthcare-based use or mix of both.	F008-24
H2:32	Dale Buildings, Tower Street	St Michael's	200	PDL	Enhancement of listed medieval wall and Cook Street gate scheduled monuments and adjacent conservation area and Registered Park and Garden. Development needs to be sensitive to Archaeological Constraint Aea and View Cone 1: Foleshill Rd, as defined in the Tall Buildings Design Guide and the Three Spires View Management Framework SPD.	STM013-24
H2:33	The Allesley Hotel, Birmingham Road	Bablake	48	PDL	Retention and enhancement of adjacent listed buildings and heritage assets and the Allesley Village Conservation Area that the site is within. Consideration needed of the Allesley Bypass dual carriageway that runs along the south of the site.	Bab001-23
H2:34	Former Chace School, Chace Avenue	Binley and Willenhall	60	PDL		BW001-23
H2:35	Former School Site, New Century Park – Land to the South of Isadora Lea	Lower Stoke	93	PDL	Site was formally earmarked as a location for a primary school, but it has been determined that this is no longer needed.	LS001-23
H2:36	Land at Spon End	Sherbourne	750	PDL	Site part of Citizen Housing regeneration portfolio. Enhancement and improvement to the River Sherbourne and consideration given to the associated floodplain. Majority of the site is in Flood Zone 2 and part with Flood Zone 3.	SH004-24
H2:37	City Centre South	St Michael's	1,575	PDL	Total allocation is linked to extant Outline and Reserved Matters permissions: OUT/2020/2876 and PL/2023/0002533/RESM to provide a high-density mixed-use development that provides commercial and learning and community uses, and public realm works. Retention and Enhancement of heritage asset.	STM18-24

H2:38	Friargate – Land bounded by Railway, Grosvenor Road, Manor Road and including Greyfriars Green and Station Square	St Michael's	1,350	PDL	Total allocation linked to extant permission OUT/2011/0036 for a mixed-use development that includes office, residential, leisure and retail development. Retention and enhancement of listed Coventry Railway Station and Greyfriars Green Conservation Area and adjacent listed buildings. Development needs to be sensitive to View Cone 12, Spencer Park and Footbridge as outlined in the Tall Buildings Design Guide and the Three Spires View Management Framework.	STM014-24

Housing Development principles

6.13 Future housing developments will be designed to create new and stable communities providing a mix and choice of housing types and tenures. Opportunities to create new areas of housing as part of mixed-use developments will also be encouraged. In accordance with the NPPF the Council will also encourage new self and custom build programmes, and community-led housing schemes, where local people wish to build their own homes and promote the provision of entry-level homes as part of meeting affordable housing need.

6.14 When considering the suitability of a site for housing development that is not already allocated, Policy H3 must be considered to ensure it is situated within a sustainable location and will ensure the creation of an appropriate and acceptable residential environment.

6.15 The principles of supporting sustainable residential development which helps support healthy communities have been considered through a range of evidence and best practice as well as an overview of local services and facilities and their proximity to homes and development opportunities across the city. It is vital that new homes are well designed, resilient and adaptable for a range of users, are free from pollution, energy efficient, easily accessible to schools, shops, health facilities, leisure provisions, open spaces, public transport and a range of other services and facilities.

6.16 As set out in the above paragraph, it is important that dwellings provide adequate space to enable a good standard of living and the Nationally Described Space Standards are to be applied. In addition, the HEDNA explores the needs of different groups in Coventry, particularly (but not exclusively) relating to an ageing population. It is important that the provision of housing is able to meet the needs of the local community including those with mobility difficulties. Therefore, in line with the HEDNA policy sets out additional standards to help meet this need.

6.17 Should development come forward that is deficient against the criteria in policy H3 then the site-specific circumstances will be considered to understand the extent to which the criteria are not met and how mitigation might be provided.

Should it be deemed appropriate and justified without excessively impacting on development viability, developer contributions will be required via a Section 106 agreement. This will be managed through Policy IM1.

STRATEGIC POLICY

Policy H3: Provision of New Housing

1. New residential development, both open market and affordable housing and including the conversion of buildings from non-residential to residential use and which provides opportunities for self-build homes and community led housing, must provide a high-quality residential environment that ensures all new dwellings:

- **a.** comply with Nationally Described Space Standards (NDSS);
- **b.** comply with internal and external standards set out in the Design Guide for New Residential Developments SPD, Householder Design Guide SPD and Open Space SPD;
- **c.** meet M4(2) - Adaptable and Accessible Dwellings;
- **d.** For major schemes, 10% of all new dwellings meet M4(3) - Wheelchair User Dwellings Adaptable and Accessible - of Building Regulation standards for access;
- **e.** Where possible be located to meet Natural England's Accessible Natural Greenspace Standards (ANGST) doorstep standards or future equivalent and where this is not possible developer contributes may be sought for local projects identified in the Council's Blue and Green Infrastructure Strategy and Action Plan; and
- **f.** contribute to the delivery of urban regeneration or to the creation of sustainable communities and overall enhance the built environment.

2. New developments must result in a satisfactory residential environment for neighbouring and future occupiers.

3. New developments must not result in existing businesses having unreasonable restrictions placed on them because of the new residential development.

4. New developments should provide sustainable and liveable neighbourhoods, have consideration to the accessibility mapping as set out in the Council's Transport strategy and where possible have convenient, reasonable and practicable access that can be accessed safely and by all abilities to:

- a. local medical services;

b. convenient shopping facilities;

c. primary school;

d. sustainable transport modes; and

e. high quality publicly accessible green space that can be used for a range of leisure and sporting activities, in line with the Open Space SPD.

5. Proposals should also be in conformity with all other relevant plan policies.

6. Sustainable transport provision and the infrastructure required to support housing development must be considered from the onset and conform to the City Council's adopted Transport Strategy to ensure all sites have easy access to high quality public transport and walking and cycling routes.

7. The delivery of custom and self-build homes and community led housing will be supported where they meet the criteria of this policy and are in accordance with all other development plan policies.

Securing a Mix of Housing

6.18 National planning policy requires local planning authorities to plan for a mix of housing. The city has undertaken a Joint HEDNA with its Warwickshire neighbours, which sets out the housing needs for Coventry, including the need for all types of housing and the needs of different groups in the community.

6.19 Policy H4 is concerned with the mix of general market housing only, whilst Policy H6 refers to the mix of housing in respect of the affordable homes element of housing developments.

6.20 Where possible, large strategic sites should reflect the housing mix set out in the HEDNA. However, it is accepted that some locations, sites and their local context lend themselves to particular types and sizes of development and therefore a pragmatic approach will be taken, with the HEDNA being used as the starting point. It is important that the objectives of the plan as a whole are taken into account in achieving the mix of homes identified by the HEDNA over the plan period.

Policy H4: Securing a Mix of Housing

1. The Council will require proposals for residential development to include a mix of market housing which contributes towards a balance of house types and sizes across the city in accordance with the latest Housing and Economic Development Needs Assessment (HEDNA) or its future equivalent.

2. In assessing the housing mix in residential schemes the Council may take into account the following circumstances where it may not be appropriate to provide the full range of housing types in accordance with the latest Housing and Economic Development Needs Assessment or its future equivalent:

a. physical constraints, such as those associated with small sites of less than 5 houses and conversion schemes, where opportunities for a range of different house types are limited;

b. locational issues, such as highly accessible sites within or close to a designated centre where larger homes and low/ medium densities may not be appropriate;

c. sites with severe development constraints where housing mix may impact on viability;

d. sites where particular house types and/ or building forms may be required in order to sustain or enhance the setting of a heritage asset;

e. developments in parish or neighbourhood plan areas, where there is an up-to-date local housing needs assessment which provides a more appropriate indication of housing need; and

f. evidence that there is no grant or equivalent funding available which would ensure that the development could viably proceed.

Managing the existing Housing Stock

6.21 People's need for housing is met by both new build and through the existing stock. As such, it is important that there is a balance between the maximum use of existing dwellings and the development of new housing. This may involve an improvement in the quality of homes, including retrofitting to improve energy efficiency and address fuel poverty as well as the clearance and redevelopment of housing which has reached the end of its useful life, but only when this has been considered in line with the environmental management policies of this plan.

6.22 In line with the above, demolition and redevelopment schemes will be considered where the existing housing does not meet local housing market needs or is in a very poor state of repair. Regeneration will be undertaken to promote sustainable urban living, enhance the public realm, combat climate change, improve accessibility and address social deprivation. Replacement provision should also represent the most efficient use of land in accordance with the Local Plan density policy. Together these considerations will ensure that regeneration projects respond to the 3 aspects of sustainable development outlined in the NPPF.

Policy H5: Managing Existing Housing Stock

1. Where appropriate, the existing housing stock will be renovated and improved, in association with the enhancement of the surrounding residential environment and to meet local housing needs. Where appropriate these works should include opportunities to retrofit existing properties with features that meet existing climate change requirements while maintaining the existing character of the existing property and to improve energy efficiency of existing homes.
2. Demolition and redevelopment schemes will be supported where:
   a. Existing housing stock does not meet local housing market needs;
   b. the redevelopment represents the principles of sustainable development;
   c. the development does not result in a net loss in the quality and size / type of dwellings currently on the site, unless it can be robustly justified;
   d. the development has considered the embodied carbon in existing buildings, along with waste disposal, transportation and construction; and
   e. the development is in line with the requirements of all other relevant policies of the Plan.
3. The conversion of existing dwellings to uses other than primary residential will be resisted, unless very special circumstances can be demonstrated including why the non-residential use would better meet the need of the local area and the aims of the Local Plan than the existing dwellings.

Affordable Housing

6.23 The NPPF provides the definition of Affordable Housing to which Policy H6 applies. The Council is committed to planning for high quality affordable housing for people who are unable to access or afford market housing. The policy intention is to ensure that a choice of housing is available to all in mixed tenure, balanced and sustainable communities.

6.24 In line with the NPPF, the HEDNA considers two main outputs, the need for social / affordable rented housing and consideration of the need for affordable home ownership products. It concludes an annual need of 941 Social / Affordable rental dwellings for newly forming households and 149 Affordable Home ownership dwellings. It should be noted that the need estimate is on a per annum basis and should not be multiplied by the plan period to get a total need. Essentially, the estimates are for the number of households who would be expected to have a need in any given year (i.e. needing to spend more than 30% of income on housing), and this does not necessarily need to be met by new build.

6.25 The NPPF sets out specific levels of requirement for affordable home ownership on development schemes, and once these specifications have been met councils can then specify their own requirement for any remaining affordable homes which need to be provided.

6.26 The Council's preference is for social rented housing and the mix of this would be determined in line with the advice from the Council's Housing strategy team using the Council's Homefinder Data which provides the most current information on local need at a particular point in time. Currently there is a particular need for larger family-sized affordable homes as people with this type of need do not progress through the waiting list as quickly as those in need of smaller accommodation. To ensure effective and timely delivery it is important that affordable housing is built on site wherever possible and is integrated into the development in a way which ensures it is indistinguishable from open market housing.

6.27 Purpose Built Student Accommodation (PBSA) has provided a significant portion of residential development in the city in recent years, and in line with Policy H10, any PBSA which is delivered outside of the defined university campus / boundary areas will need to contribute to the delivery of affordable housing in the city. Beyond the campus areas of the universities, PBSA is competing for residential land, much of which is required to deliver the urban-focused spatial strategy of the reviewed Local Plan. Should PBSA be permitted by virtue of the exceptions approach of H10, it should contribute to the delivery of affordable stock (in the form of a contribution), much of which will be needed to retain recent graduates and attract other young professionals in the city, ensuring they have affordable options available to them to live and work in the area. The calculation in policy is based on the Housing Delivery Test average number of students in student-only households calculation (2.5) multiplied by the Council's affordable housing unit threshold.

6.28 Build to rent will also be expected to contribute to affordable housing, in the form of affordable private rents. This will be a 10% provision requirement with a local unit threshold of 10 units. This approach recognises the unique circumstances of the build to rent model whilst ensuring a unified ownership and management of all homes for the long term. The discounted private rent should be managed collectively with the market units by a single build to rent landlord, as set out by national guidance. The affordable private rent homes should be fully integrated into the development with no differences between them and the market units. Eligibility for occupying affordable private rent homes should be agreed locally between the Council and the scheme operator with regard to local household income levels and local rent levels and with regard to criteria set out in national guidance.

6.29 The supporting text to Policy H13 sets out the mechanism that could be included in the Section 106 Agreement to recoup (clawback) the value of the

affordable housing provision that is withdrawn if affordable private rent homes are converted to another tenure or if the private market rent homes are converted to another tenure before the end of a covenant period.

6.30 Co-living developments will be expected to contribute to the delivery of affordable housing, in the form of affordable private rent.

STRATEGIC POLICY

Policy H6: Affordable Housing

Proportion of Affordable Housing

1. The Council will seek to maximise the delivery of affordable housing across the city, in accordance with the high level of need set out in the HEDNA. Affordable housing delivery should be in accordance with the Council's Affordable Housing SPD.

2. Positive weight will be given to schemes which contribute to the delivery of house types which address the Council's long-standing need for larger house types on the affordable housing waiting list, as identified and monitored by the Council's Homefinder data or future equivalent.

3. New residential developments of 10 or more dwellings (gross) located within the area identified at Appendix 9(c) on individual sites, or on sites of more than 1ha will be required to provide 25% of all dwellings as affordable. This excludes Purpose Built Student Accommodation, co-living accommodation and Built to Rent accommodation, where the affordable housing provision is set out in points 5, 6 and 7 of this policy.

4. Affordable housing will be expected to be provided on site with the exception of Purpose Built Student Accommodation (PBSA) as set out in Point 5.

5. On sites providing 25 bed spaces or more of Purpose Built Student Accommodation (PBSA) outside of Campus as defined at policy H10, a commuted sum will be required in lieu of on-site 20% affordable housing provision

6. On sites providing build to rent accommodation of 10 units or more, developments will be expected to provide 10% of all dwellings as affordable private rent in line with the following:

a. The affordable rent homes should be in accordance with the requirements of the PPG and be at genuinely affordable rents to be agreed with the council.

b. The eligibility criteria for the occupants of the affordable homes and the discount, size and mix of the affordable units is to be agreed with the council.

c. Affordable private rent and private market rent units within a development should be managed collectively by a single build to rent landlord (no need for the involvement of a registered landlord). The affordable private rent should be distributed throughout the development and physically indistinguishable from the market rent homes in terms of quality and size.

7. On sites providing co-living accommodation of 25 bed spaces or more (gross), developments will be expected to provide 25% of all bed spaces as affordable private rent.

Tenure

8. The affordable housing tenure and mix will be based on the need highlighted in the latest HEDNA supplemented with Homefinder (or equivalent) data. On this basis the Council will expect to seek:

a. a tenure split of 60% social/affordable rent and 40% intermediate provision,

b. of the social and affordable rent provision a minimum of half should be for social rent; and

c. Accounting for any nationally set contribution for intermediate home ownership products, the remainder of the affordable home ownership is to be delivered as other intermediate home ownership products.

9. Proposals must meet national policy requirements relating to affordable home ownership initiatives and local eligibility criteria, and where these are updated or altered, the latest requirements will be applicable.

Housing Size Mix

10. The expected mix for affordable housing provision will initially be guided by the HEDNA, however, through engagement with the Council and Registered Providers, positive weight will be given to a housing mix that is also informed by the latest Homefinder data (or future equivalent) to ensure the delivery reflects the most up to date need and circumstances. The affordable housing mix should reflect the overall mix and type of housing proposed across the application site guided by an updated affordable housing SPD.

Where a policy compliant provision is not provided

11. Where the required specified level, tenure and size mix of affordable housing cannot be provided on site, including for reasons of viability, robust evidence must be presented to justify a reduced or alternative form of contribution.

12. A reduction in the requirements of policy EM11 may be presented for assessment in order to maximise Affordable Housing delivery.

Design Standards

13. Through high design standards, new affordable housing units must be appropriately integrated within developments and with other affordable homes adjoining the site.

14 Affordable housing proposals must be in accordance with the design principles set out in Policy H3, including NDSS standards and the internal and external standards set out in the Design Guide for New Residential Developments SPD and Householder Design Guide SPD.

Gypsies and Travellers

6.31 A Gypsy and Traveller Accommodation Assessment (GTAA) was completed in February 2023. This concludes that there are currently 5 authorised pitches on Burbages Lane and an expected supply of 12 pitches following the redevelopment of the Siskin Drive site. This is able to cater for the assessed need (15 pitches) over the short term 2022/23 to 2026/27. Over the longer plan period to 2041 the GTAA concludes there will be a shortfall of 6 pitches but that these could potentially be accommodated at Burbages Lane.

6.32 In order to provide resilience over the plan period the GTAA also recommends a series of requirements which should be taken into account when assessing planning applications. The study recommends that the criteria in policy are updated to ensure sustainability of location, adequate access and servicing, appropriate screening and landscaping, free from environmental hazards and flood risk, integration with the local community, enabling mixed business and residential accommodation and make adequate provision for on site requirements including play areas, storage, provision for recycling and waste management. The GTAA also recommends supportive policy for the provision of transit facilities or negotiated stopping points.

Policy H7: Gypsy and Traveller Accommodation

1. Provision will be made for at least 6 permanent pitches for Gypsies and Travellers.

2. Proposals for additional Gypsy and Traveller sites outside of the Green Belt (and within it, if very special circumstances have been demonstrated) will be assessed against the following criteria as set out in the Council's Gypsy and Traveller Accommodation Assessment (GTAA):

a. The site's use should not conflict with other development plan policies or national planning policy relating to issues such as risk from flooding,

including sites not being in functional floodplains; contamination; or agricultural land quality;

b. The site should be in a sustainable location in terms of being within reasonable travelling distance of local services and community facilities, including health care and schools;

c. The site should enable safe and convenient pedestrian and vehicle access to and from the public highway, and adequate space for vehicle parking, turning and servicing;

d. The site should be served by adequate water and sewerage connections, and drainage, power and waste and recycling facilities;

e. Proposals must not have an adverse impact on the amenities of occupiers of nearby properties or the appearance or character of the area in which it would be situated, with proposals including appropriate landscaping;

f. The site must not be affected by environmental hazards that may affect the residents' health or welfare;

g. Proposals should make adequate provision for on-site facilities that meet best practice for modern Traveller site requirements, including play areas, storage and mixed business and residential accommodation; and

h. The proposal must be well related to the size and location of the site and respects the scale of the nearest settled community.

3. Proposals for transit and / or stop over areas will be supported where they meet an evidenced need and accord with other policies in this plan.

Specialist Housing

6.33 As set out in the HEDNA there is a need to ensure that the Local Plan can positively support all specialist forms of housing including a range of types of older persons housing, housing with elements of care, and hostels. As the population ages, it can be expected that there will be associated increases in the numbers of people presenting with long term health problems or disability.

6.34 Invariably, there will be a combination of those with disabilities and long-term health problems that continue to live at home with family, those who chose to live independently with the possibility of incorporating adaptations into their homes (see Policy H3) and those who choose to move into supported housing.

6.35 The HEDNA identifies a range of different types of older persons accommodation Definitions of Different Types of Older Persons' Accommodation.

- Age-restricted general market housing: This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared

amenities such as communal gardens, but does not include support or care services.

- Retirement living or sheltered housing (housing with support): This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24-hour on-site assistance (alarm) and a warden or house manager.
- Extra care housing or housing with care: This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24-hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.
- Residential care homes and nursing homes (care bedspaces): These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.

6.36 Whilst it is important that a range of specialist accommodation will need to be supported over the plan period, in Coventry the need is particularly for affordable housing (housing with support).

Policy H8: Specialist Housing including specialist housing with elements of Care, Older Persons accommodation and hostels

1. Proposals for specialist housing, which includes accommodation with elements of care, support for people in need and older person housing will be supported where a local need can be demonstrated. Positive weight will be given to proposals that provide private rental opportunities that are affordable for those who do not meet social care eligibility criteria.
2. Proposals will be encouraged in areas which are accessible by a choice of means of sustainable transport and which are easily accessible to the key local services listed in point 3 of policy H3 and which are appropriate to the specific needs of the residents and employees.
3. Proposals should be laid out to allow the intended residents to live with the maximum level of independence that considers the changing needs of residents and should be of a high quality and design, compatible with the character of the

surrounding area and be in line with the design requirements set out in Policy H3 where applicable.

4. Where relevant, proposals should ensure all dwellings meet M4(2) and 10% of dwellings meet M4(3) standards.

Residential Density

6.37 The NPPF requires that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Local plan policies should make as much use as possible of previously-developed or 'brownfield' land.

6.38 The NPPF specifically encourages the identification of locally set density requirements that reflect local circumstances. Housing density can affect the quality of life, the environment, the economy, and the social cohesion of a place. Higher density developments are recognized to encourage the provision and use of public transport and the retention and development of social and community facilities.

6.39 The Residential Density Study (2024) and accompanying Background Paper seek to maximise the effective use of land in a way which takes into account Coventry's distinct local context, market delivery and best practice.

6.40 Coventry demonstrates the scale of built form and residential density increasing towards the city centre, and therefore the density of new residential development should reflect the patterns which have emerged through the study.

6.41 It is important that density policies are applied in tandem with other policies of the plan and related SPDs to ensure appropriate levels of amenity space, landscaping and other onsite infrastructure. As such the Council's policy is set in the context of net densities that seek to maintain:

- At least 20% of gross site area to remain undeveloped on sites in excess of 2ha
- At least 15% of gross site area to remain undeveloped on sites below 2ha;
- At least 10% of gross site area to remain undeveloped on sites within the transition zone
- At least 5% of gross site area to remain undeveloped on sites within the city centre

6.42 The undeveloped areas should focus on providing localised green spaces, landscaping and other public realm provisions as appropriate. Main roads, parking spaces and gardens have been considered essential elements of a residential property and are counted towards the developable area. The reduction of site area to reflect density will also help to support the Council's green space standards and ensure high quality built environments. Exceptions to this may exist as part of site proposals to reflect site specific circumstances.

Policy H9: Residential Density

1. Residential development, including conversions, must make the most effective and efficient use of land.
2. Proposed development density should be informed by a site's local character and context, in alignment with other plan policies.
3. To ensure that the most effective use of land, new developments, with relevant consideration to Part 2 of this policy, should seek to deliver the following densities:
    - Greenfield sites – 35 dwellings per hectare (net).
    - Brownfield sites 45 dwellings per hectare (net).
    - Sites within the City Centre Transition Zone* 125 dwellings per hectare (net).
    - Development within the defined City Centre boundary 250 dwellings per hectare (net).

*City Centre Transition Zone as shown at Appendix 9(d)

**City Centre boundary as shown at Appendix 9(d)

Student Accommodation

6.43 The Council commissioned a Purpose Built Student Accommodation (PBSA) Study in 2024, to provide an up to date position in terms of the student market and to reflect upon the proliferation of PBSA in the city as evidenced by the Authorities Monitoring Reports. Whilst student accommodation provides an important element of residential need for the cities' two universities (Coventry and Warwick, the campus for the latter also sitting within Warwick District), in order to deliver sustainable development the situation needs to be carefully managed.

6.44 The study made a series of recommendations based upon its assessment of the current market. These include a zoned approach to determine where PBSA should be encouraged to be located (and where it should not be encouraged), recommendations for good quality design and adaptability especially for future potential changes of use, up to date understanding of the current market including the universities own masterplans, and ongoing monitoring.

6.45 The changing face of student accommodation means that it now sits within a variety of use class categories. In terms of creating living environments specifically for students within existing residential provisions this policy will only relate to schemes that will occupy more than 6 students. Where proposals relate to purpose built student accommodation or the conversion of non–

residential properties to student accommodation however the policy will apply in all cases.

6.46 The tenure of student accommodation will be secured through a Section 106 agreement. This reflects the fact that should the properties be occupied by other aspects of the city's population then it would be required to contribute affordable housing and potentially other Section 106 contributions. Should the tenure change to general market or affordable housing then such contributions will need to be considered through a variation of the Section 106 agreement and/or planning permission.

6.47 For the purposes of 'Campus' within policy H10, the areas are as per the adopted Warwick University SPD, and the University and Enterprise Area of the City Centre, or future adopted university masterplan Supplementary Planning Document.

Policy H10: Student Accommodation

1. PBSA development must be located within or immediately adjacent to the University of Warwick Campus or Coventry University Campus, unless exceptional circumstances demonstrate otherwise.

2. Purpose Built Student Accommodation (PBSA), proposed outside of the areas identified in point 1, whether new build or conversions, will be delivered in line with the Council's PBSA monitor and manage approach and will only be considered appropriate where:

a. The PBSA monitor and manage approach demonstrates evidence of need for additional student accommodation; or

b. There is support from one of the City's universities that evidences a need for additional student accommodation.

3. Proposals must provide evidence to show adaptability to other uses by being designed in such a way that it can be capable of being re-configured through internal alterations to meet NDSS standards to meet general housing needs in the future.

4. Developments that comprise a predominant studio ratio will be considered in line with the most up to date available evidence.

5. Proposals should comprise predominantly cluster units of no more than 8 units per cluster.

6. Design innovation will be encouraged within the sector, particularly in high quality affordable products, in line with the design standards set out in the Residential Design Guide SPD.

7. To support the intended use of the proposals the specified tenure will be secured through a Section 106 agreement.

8. Where a change of use is proposed to part of an existing student accommodation block to another residential use, the residential use must be self-contained and segmented from the student accommodation.

Homes in Multiple Occupation

6.48 The Council has a separate Homes in Multiple Occupation (HMO) Development Plan Document and applications for HMOs must be considered in accordance with this.

Policy H11: Homes in Multiple Occupation (HMOs)

All applications for Homes in Multiple Occupation (HMOs) will be determined in accordance with the Council's Homes in Multiple Occupation Development Plan Document alongside other policies in the adopted Local Plan.

Build to Rent

6.49 The NPPF glossary defines Build to Rent as 'Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.'

6.50 Build to Rent is an emerging sector which has significant potential to address some of Coventry's local housing need particularly in line with the increased densification, urban-focused strategy and a need to deliver a range of housing types. The build to rent policy has been developed in recognition of the unique way that build to rent operates. Build to rent relies on income through rent over several years, rather than an upfront return on sales.

6.51 The Build to Rent policy along with Policy H6 provides the specific approach to the affordable housing offer for Build to Rent proposals. The approach recognises the build to rent model whilst ensuring a unified ownership and management of all the homes for the long term. Where a build to rent development meets the specific affordable housing threshold, Policy H6 states the affordable homes should be discounted private rent, managed collectively with the market units by a single build to rent landlord, as set out by national guidance. The affordable private rent homes should be fully integrated into the development with no differences between them and the market units. Eligibility

for occupying affordable private rent homes should be agreed locally between the Council and the scheme operator having regard to local household income levels and local rent levels and to criteria set out in national guidance.

6.52 Circumstances may arise where developers need to sell all or part of a build to rent scheme into owner occupation or to multiple landlords or, exceptionally, to convert affordable private rent units to another tenure. As a result, national guidance states Section 106 Agreements should include a mechanism to recoup (clawback) the value of the affordable housing provision that is withdrawn if affordable private rent homes are converted to another tenure or if the private market rent homes are converted to another tenure before the end of a covenant period. National guidance also includes a formula that may be used to calculate the amount of clawback payable when affordable private rent homes are withdrawn with the proceeds to be spent on the provision of alternative affordable housing.

6.53 Consideration should also be given to a covenant period for the retention of private market rent homes in that tenure and potential compensation mechanisms in the event that private market rent homes are sold before the expiration of an agreed covenant period.

Policy H12 – Build to Rent

1. Proposals for the development of Build to Rent housing will be supported where they are in accordance with all other development plan policies and where they comply with the following criteria:

   a. the development provides a high-quality residential environment that improves housing choice and makes a positive contribution to the achievement of mixed and sustainable communities in accordance with Policy H3;

   b. all the dwellings are self-contained and let separately;

   c. the build to rent housing is under unified ownership and will be subject to common management;

   d. the development will provide professional and on-site management;

   e. the development will offer tenancies of at least 3 years available to all tenants;

   f. the development complies with the Nationally Described Space Standards;

   g. The homes will be secured as part of a Section 106 agreement, which should include the process for the management and letting arrangements, covenants the build to rent homes are held under and any clawback arrangements.

   h. The development delivers a level of affordable housing as set out in Policy H6.

Co-Living

6.54 As set out in the HEDNA, the concept of co-living in its modern form of housing is relatively new, and whilst it is not specifically defined in the NPPF, it is often used as part of a wider definition relating to a type of intentional community where residents share living space and a set of interests, values and/or intentions.

6.55 In its current form, modern co-living in the UK tends to be urban focused and integrated into a single building, house, or apartment, a sharing of amenities, and a demographic trend towards young professionals. As a market segment, this is most well developed currently in London, in models that offer private bedrooms, shared common spaces and community events, and an all-inclusive rent. However the model is starting to expand to other cities, especially due to the decline in affordability of home ownership, the associated demand for private rental housing but also for the flexibility and choice it provides including shared live / workspace opportunities.

6.56 Given that this is an emerging housing sector, it is important that co-living schemes are distinguished from HMOs and that in determining that distinction this is reflective of the local context.

6.57 In line with the recommendations of the HEDNA and its citation of emerging models of typical co-living schemes the City Council defines Co-Living developments as shared living that comprises small private living accommodation alongside communal kitchens, living areas, outside amenity space and other amenities that is under a common management and would typically come under the sui-generis use as they are non-self-contained market housing.

6.58 In the absence of a clear national policy position on co-living developments the Co-living policy has been developed in recognition of the growing attractiveness of this form of housing in the emerging housing market and to ensure co-living schemes provide good quality residential accommodation; support the Council's objectives of creating sustainable and healthy neighbourhoods; and contributes to meeting the city's housing need.

6.59 Drawing on the policy frameworks established in the London Plan, the HEDNA provides detailed recommendations for a policy which supports high quality co-living schemes against a number of criteria. The HEDNA analysis concludes that there is a market for co-living in Coventry and while it is in its infancy, the current co-living business model and characteristics principally draw on a large base of transient younger, high skilled professional households and individuals - particularly those without dependents.

6.60 The Council has based the minimum private bedroom size of 25sqm for a single occupancy room on policy and guidance on co-living produced by other local authorities, namely the core cities research undertaken by SWAP Architects for Birmingham City Council 'Co-living Key Metrics' (data on UK co-living schemes located outside of London). The Council has used this research by virtue of the size and profile of many of the core cities being comparable with Coventry.

6.61 A two-person room should be designed for two people, including greater distinction and separation between sleeping and living areas and not just a minor enlargement of a single occupancy room.

6.62 Private rooms should include an ensuite, seating, desk space for home workings and sufficient storage space for clothes, luggage cases, bathroom items, laundry, general and recyclable waste and for other possessions. It should also provide a good living environment in line with the Council's New Residential Development Design Guide SPD, including good levels of natural light, outlook, privacy and ventilation.

6.63 The policy stresses the importance of adequately sized communal space to ensure an overall high-quality residential environment. This includes ensuring a range of indoor communal spaces are provided such as kitchens, lounges, dining rooms, workspaces and indoor recreation spaces for the exclusive use of residents without a charge and that these are sufficient so they can be used by residents at relatively high levels of demand.

6.64 The Council has based the average internal communal amenity space of 4.5sqm per bedspace to be provided, also on the core cities researched by SWAP Architects for Birmingham City Council 'Co-living Key Metrics' (data on UK co-living schemes located outside of London, again because the size and profile of the core cities the research was based on were considered as comparable with Coventry.

6.65 Internal communal space excludes laundry rooms, toilets, residents' storage, circulation space, any space that residents incur additional cost to access and use, spaces that are open to the public to use or are not for the exclusive access and use of residents, management areas, cycle storage, car parks and external communal space.

6.66 The policy stresses the importance of communal kitchens and sets a maximum number of 8 bedrooms per communal kitchen. This is in line with the Council's maximum number of bedspaces per cluster unit for PBSA developments, given the similarity in residential accommodation. Communal kitchens, along with other internal communal amenity space should be sufficient, in terms of location, spread, facilities and size, to meet the requirements of the intended number of residents at times of relatively high demand. Shared kitchens should have convenient access that does not require any residents to travel between

different floors and which has adequate facilities and space for residents to store food and cooking and eating utensils and to prepare meals at times of relatively high demand (typically 6pm until 8:30pm).

6.67 Adequate laundry and drying facilities will be provided solely for the use of residents and should not also be used by the management company and be separate from the residents' internal communal space. At least one washer and one dryer should be provided for every 10 residents along with an additional secure and naturally ventilated space for air drying clothes.

6.68 Co-living schemes should include adequate onsite communal outdoor amenity space in line with the Council's New Residential Development Design Guide SPD and Open Space SPD and is designed and managed in a way that fosters social interaction and encourages engagement between people.

6.69 Exceptions to the space standards set out in the policy will only be considered where a robust justification has been provided to the satisfaction of the Council. This could include appropriate evidence that to deliver innovative high-quality design, deal with site specific issues or respond to local character, adhering to the standards is not feasible due to physical constraints or financial viability issues. Any reduction in standards as a result must demonstrate that residential amenity will not be significantly diminished.

6.70 Co-living schemes will be required to contribute to the delivery of affordable housing in the form of discounted private rent as set out in Policy H6. A 25% provision will be required on schemes of 25 co-living bedspaces or more. This is based on the Housing Delivery Test ratio calculations for student living, by reason of the most comparable residential model. Shared accommodation like co-living is not an affordable housing product as it does not meet minimum housing space standards and does not provide stable long-term accommodation that meets the affordable housing need in the city.

6.71 A management plan should accompany any planning application showing how the whole development will be managed and maintained and how it will be positively integrated into the surrounding communities. The agreed management plan should be secured through planning condition or a Section 106 agreement and should include, but not be limited to, detailed information on:

a. security and fire safety procedures

b. moving in and out arrangements

c. the maintenance and repair of internal and external communal areas including cycle storage

d. cleaning regime of communal spaces and private units

e. how linen changing services will operate

f. how deliveries for servicing the development and residents' deliveries will be managed

g. crime prevention and anti-social behaviour measures

h. key responsibilities of the site staff which should include the organisation of social activities and a system communication for residents to foster a sense of community

i. promoting good neighbourliness

j. an annual monitoring and review framework to ensure the effectiveness of the management plan

6.72 Tenancies should be for a minimum of three months to ensure co-living developments do not effectively operate as a hostel or hotel. A maximum stay should be defined for short-term lets, for example, twelve months. However, tenancy durations should be reviewed on an on-going basis to ensure they remain appropriate.

6.73 Developments will be encouraged to be designed in a way that can be easily converted into self-contained policy compliant dwellings so as to provide flexibility to respond to changing needs if required.

Policy H13 – Co-living

1. Co-living proposals will be supported where they are in accordance with all other development plan policies and where they comply with the following:

a. it is of good quality and design and adhere to a minimum bedroom size of 25sqm for a single occupancy room, inclusive of an ensuite and storage space;

b. it is well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency;

c. it is under single management;

d. The facility has a concierge or other adequate safety and security onsite personnel;

e. its units are all for rent with minimum tenancy length of no less than three months;

f. The average internal communal amenity space is at least 4.5sqm per bedspace;

g. communal facilities and services are provided that are sufficient, in terms of location, spread, facilities and size, to meet the requirements of the intended number of residents at times of relatively high demand and offer at least:

h. Direct access to a communal kitchen that does not require any residents to travel between different floors and which has adequate facilities for a maximum of 8 bedrooms and adequate space for residents to store food and cooking and eating utensils and to prepare meals at times of relatively high demand.

i. outside communal amenity space (roof terrace and/or garden);

ii. internal communal amenity space (dining rooms, lounges, workspace); and

iii. laundry and drying facilities.

i. the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes;

j. a management plan is provided with the application;

k. it delivers a level of affordable housing (discounted private rent) as set out in Policy H6.

7. Retail and Centres

Key Evidence

Retail and Centres Study Stage 1 April 2023

Retail and Centres Study Stage 2 February 2024

Retail and Centres Background Paper 2024

Overview

7.1 The role and function of town centres nationally is changing as people shop and undertake leisure activities in different ways than they have done in the past. As such, town centres need to diversify, making wider provisions to support their community, whilst ensuring they are attractive, diverse and accessible to those wanting to use them. Successful centres are of vital importance to local communities across the city as they play an important part in supporting economic growth, encouraging investment, urban regeneration and job creation.

7.2 Retail and centres in Coventry, along with the rest of the UK are facing many challenges. Online shopping trends, the pandemic, economic uncertainty and the cost of living have all had an impact. The commercial sector, which includes restaurants, cafes and recreational, cultural and other uses has also experienced major changes and challenges in recent years but with leisure spend expected to increase in real terms in the future, such uses will continue to be an important component of a town centre's offer.

7.3 The NPPF states that planning policies and decisions should support the role that town centres play at the heart of local communities. Planning policies should define a network and hierarchy of town centres and the extent of the town centre boundaries should be defined.

7.4 The NPPF determines what uses are important to the vitality and viability of town centres. It defines 'Main Town Centre Uses' as follows: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

7.5 In order to protect the vitality and viability of Town Centres, should any of these uses be proposed outside of a town centre boundary, a 'sequential test' will be applied to planning applications looking first at whether these could be accommodated in a centre, then edge of centre, with out of centre sites only being suitable for consideration as a last resort.

7.6 With this in mind this plan will support new town-centre developments across Coventry building upon the NPPF's centres-first approach and establishing the city centre as the primary focus for appropriate investment. It sets out Coventry's hierarchy of centres, as well as identifying a range of proposals which will support and enhance the respective roles of these centres. Proposals will also be encouraged which diversify the range of uses in designated centres without compromising the shopping function, particularly those uses which make the town centre more attractive to residents, employers, shoppers and visitors.

7.7 Across the city there are also a range of out of centre retail parks. It is recognised that whilst these areas currently complement the city's retail offer, any proposals for the future expansion, intensification or changes of use at these locations should be carefully assessed to ensure that they do not have a detrimental impact on designated centres and any existing, committed or planned town centre investment.

7.8 The city also contains a network of local centres and local shops serving the daily needs of local communities. These facilities are within easy walking distance of many people thus reducing the need to travel and contribute towards sustainable communities.

7.9 To support the review of the Local Plan a Retail and Centres Study was commissioned to inform Local Plan Policy. It assesses whether there is any need to allocate sites for retail and the capacity for these (to ensure they serve an appropriate level of need without undermining other centres), sets out a recommended centres hierarchy, and advises on the application of the sequential and impact tests.

Retail Growth

7.10 Centres now serve a much wider range of needs than retail. However, retail is still an important aspect of centres and assessment has been undertaken to consider whether any further growth in this sector needs to be specifically planned for. The new Strategic Urban Extensions at Eastern Green need to provide retail space for the day to day needs of these growing communities and as such this need has been defined.

Policy R1: Delivering Retail Growth

1. The following sites/areas are allocated to support the provision of retail floor space across Coventry. These schemes are to be delivered in accordance with the specifications in this policy and other policies within this plan.

Site	Proposed floor space (sq.m gross)	Details
New Eastern Green District Centre	Up to 10,000	To include a range of retail and leisure uses
New Eastern Green Local Centre	Up to 1000sqm	1 To include a range of small scale units providing a range of local community uses and top up provisions. 2 The comprehensive redevelopment of the Riley Square element of Bell Green District Centre will be supported in accordance with an overarching Masterplan for the area. 3 Further retail, leisure and other town centre uses at Arena Park and Brandon Road Major District Centres will not be supported during the plan period unless it is demonstrated that it will not have a significant adverse impact on the city centre or is an essential element of supporting the wider tourism functions.
New Keresley Local Centre (South)	Up to 1,500	Local centre to include a range of small scale units providing a range of local community uses and top up provisions.

Centres Hierarchy

7.11 The Centres Hierarchy is defined in Policy R3. Maps can be seen at Appendix 9e. At the top of the Hierarchy is Coventry City Centre. Policy R2 sets out the development strategy for the centre: it is the main shopping and town centre

use destination and it needs to remain competitive, not just in the wider region but also locally.

7.12 Coventry City Centre is generally a vital and viable centre, serving shoppers from across the City and beyond, particularly for comparison (eg clothes, shoes, household goods) shopping. However, it is demonstrating clear signs of weakness, including a declining comparison offer and high and increasing vacancy rates.

7.13 The centre however does have a strong leisure service-orientated function, including a reasonably strong food and beverage offer. This provides a good basis for a diversified city centre offer which, together with the delivery of planned new developments and improvements, will help to ensure the City Centre's continued health and role at the top of the City's retail hierarchy.

Policy R2: Coventry City Centre – Development Strategy

1. The city centre will continue to be developed and regenerated to ensure it is a truly world class city centre, leading in design, sustainability and culture. This will be achieved by:

a. Enhancement of its position as a focus for the entire sub-region and as a national and international destination to live, work and play;

b. Enhancement of its retail and leisure offer to strengthen the city's sub-regional role;

c. Provision of high quality office space;

d. Becoming a hub for education;

e. Including a variety of places to live which cater for different needs;

f. Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment;

g. A connected public realm including public squares and green spaces, easily accessible through the creation of desirable and legible pedestrian routes;

h. Accessible for all;

i. Providing an attractive and safe environment for pedestrians, cyclists and motorists;

j. Provide a high-quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure;

k. High quality sustainable built design;

l. Continuing to develop a vibrant and attractive night time economy;

m. Providing opportunities to improve health and wellbeing;

n. Continuing to support greater integration of the university within the wider city centre in accordance with the City Centre policies of this plan;

o. Recognising and preserving key views to the iconic three spires of St Michaels, Holy Trinity and Christchurch;

p. Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for de-culverting wherever possible.

7.13 To ensure that the vitality and viability of town centres is protected and enhanced it is important that a hierarchy of centres is established, in line with the NPPF. As set out previously Coventry City Centre sits at the top of this hierarchy. In line with the recommendations of the Retail and Centres Study 2024 the following hierarchy is established.

STRATEGIC POLICY

Policy R3: The Network of Centres

1.To support the city centre, the Council will designate, enhance, maintain and protect a network of Centres consisting of Major District Centres, District Centres and Local Centres. These Centres will be the preferred locations for new shops, and other Main Town Centre and community facility uses which do not serve a city-wide catchment.

a. A residential element will be promoted and encouraged, subject to the creation of a satisfactory residential environment and so long as it does not undermine the functionality of the centre;

b. Improvement to the environment and accessibility will be promoted and encouraged.

2 Centre boundaries and Primary Shopping Areas (PSA) for the following Major District Centres are shown on the Policies Map at:

a. Arena Park;

b. Cannon Park;

c. Brandon Road.

They will complement but not compete with the city centre and will contain a scale of development which is demonstrated to not impact negatively on the city centre and supports the needs of their part of the city.

3. Centre boundaries and Primary Shopping Areas for the following District Centres are shown on the Policies Map at:

a. Ball Hill;

b. Bell Green;

c. Brade Drive;

d. Daventry Road;

e. Earlsdon;

f. Eastern Green*

g. Foleshill;

h. Jardine Crescent;

i. Jubilee Crescent.

They will contain a scale of development which is demonstrated to not impact negatively on higher order centres and supports the needs of their district of the city for bulk convenience shopping as well as an element of comparison shopping, service and catering uses. Social, community, leisure and small scale office uses will also be acceptable.

4 Centre boundaries for the following Local Centres are shown on the Policies Map at:

a. Acorn Street;

b. Ansty Road;

c. Baginton Road;

d. Bannerbrook;

e. Barkers Butts Lane;

f. Binley Road;

g. Birmingham Road;

h. Broad Park Road;

i. Charter Avenue;

j. Eastern Green*

k. Far Gosford Street;

l. Green Lane;

m. Hillfields;

n. Holbrook Lane;

o. Holyhead Road;

p. Keresley Road;

q. Keresley South;*

r. Longford;

s. Quorn Way;

t. Radford Road;

u. Station Avenue;

v. Walsgrave Road;

w. Willenhall;

x. Winsford Avenue.

They will contain an appropriate scale of development which is demonstrated to not impact negatively on higher order centres and supports their immediate locality for day-to-day convenience shopping and also some service and restaurant uses; and social, community and leisure uses. Small scale office uses will also be acceptable.

*Eastern Green District and Local Centres and Keresley South Local Centre are identified as broad locations due to the sites not yet being built out.

7.14 In line with the NPPF and to ensure that the vitality and viability of the centres hierarchy is not undermined it is important to establish an approach for the consideration of Main Town Centre uses where these are proposed outside of a centre.

STRATEGIC POLICY

Policy R4: Out of Centre Proposals

1. Proposals for retail and other Main Town Centre uses (including proposals for the expansion or re-configuration of existing uses and the variation of existing conditions) will not be permitted in out-of-centre locations unless they satisfy the Sequential Assessment and the Impact Test (where appropriate).
2. Sequential Assessment

   a. A Sequential Assessment will be required for all Main Town Centre use proposals or any other use within use class E and F (or subsequent equivalent of these use classes), outside a defined centre and should be prepared in accordance with national guidance. This should have regard to the centres hierarchy set out in policy R3.

   b. Where in-centre options are exhausted, the sequential assessment will be applied to edge of centre locations as follows:

- Where there is a defined Primary Shopping Area within a centre, retail proposals which are within 300m of a defined Primary Shopping Area boundary as follows:

  i. Arena Park;

ii. Cannon Park;

iii. Brandon Road.

iv. Ball Hill;

v. Bell Green;

vi. Brade Drive;

vii. Daventry Road;

viii. Earlsdon;

ix. Foleshill;

x. Jardine Crescent;

xi. Jubilee Crescent.

- Other Main Town Centre use proposals within 300m of a defined centre boundary

c. Retail proposals close to centres which do not have a defined PSA.

3. Impact Test

a. An Impact Test will be required for all retail and other Main Town Centre use proposals outside a defined centre that exceed:

- 1,000 sqm gross for schemes expected to impact on, or have the potential to impact on Coventry City Centre;
- 500 sqm gross for schemes expected to impact on, or have the potential to impact on the Major District Centres; and
- 250 sqm gross for schemes expected to impact on, or have the potential to impact on the District Centres.

The Assessment of Impact should be prepared in accordance with national guidance and consider the potential impact on the vitality, viability, role and character of a defined centre(s) within the centres hierarchy (as set out in policy R3).

Centres to be considered when undertaking sequential assessments and impact tests will be considered on a case-by-case basis.

Retail Frontages and Ground Floor Units in defined centres

7.15 Designated centres have been identified on the basis of their function and role within local communities, with a primary purpose of making retail and shopping provisions available to their local community in a sustainable and accessible way. The role and offer of centres is changing though and the need for flexibility is becoming increasingly important. This is particularly true within Coventry where vacancy rates are relatively high. Therefore, with the exception of the

city centre, there are no plans to designate primary or secondary retail frontages.

7.16 When considering uses within the centres hierarchy this is generally focused towards the ground floor of units. As such, the ground floor element of these units is of primary importance as they offer the 'shop windows' for the centre.

7.17 By considering the issues identified in Policy R5, such proposals will be assessed in the context of ensuring and maintaining a viable and vibrant centre with lively street frontages.

7.18 By way of prominence and size of the unit, consideration will need to be given to the character of the centre and how the unit in question compares to other units within the centre. For example, Coventry's defined centres are characterised by a concentration of smaller units supplemented by a small number of larger units that are more prominent in terms of size and frontage within the centre. They are also often 'anchor' type units within the centres and provide a principle focus and attraction. The change of use of such a unit is likely to have a greater impact in terms of prominence and frontage than the change of use of a smaller unit. Furthermore, consideration will also need to be given to the layout of the centre. This will need to have regard to whether the centre is a single grouping of units in a continuous row or if it is segregated by roads or open space etc. Where a centre is focused around more than one grouping of units, it should normally be the single grouping that is considered when examining the prominence of the unit. Where it is a single grouping the whole centre should be assessed. Further detail can be found in the Design Guidance for Shopfronts SPD.

7.19 It may also be important to consider the highway implications of non-retail proposals, especially if such proposals involve larger social or community provisions which may require significant car parking or concentration of activity at certain periods.

Policy R5: Retail Frontages and Ground Floor Units in defined centres

1. Proposals to use ground floor units within defined centres for non-A E class uses will normally be permitted provided that:
   - **a.** the primary function of the centre would not be undermined in the context of Policy R3;
   - **b.** the use would make a positive contribution to the overall role, vitality and viability of the centre;
   - **c.** the use is compatible with other Plan policies.

2. Proposals should seek to actively enhance the frontage of a unit within a defined centre in accordance with the Design Guidance for Shopfronts SPD

Restaurants, Bars and Hot Food Takeaways

7.20 The creation of food and drink uses have become increasingly flexible in recent years following changes in permitted development rights and reflects the change and diversification of modern town centres.

7.21 The Council has pledged to improve its population's health and wellbeing and to reduce health inequalities. One of the challenges the Council faces in promoting healthy eating is the availability of foods high in fat, salt and sugar in local neighbourhoods, including the prevalence of hot food takeaways in some areas.

7.22 Such uses do, however, have the potential to cause significant problems with impact upon residential amenity, highways and parking. Hot food takeaways often attract considerable customer numbers and are regularly associated with issues such as litter, waste disposal, noise, odour, traffic and health. For a combination of these reasons, they will normally only be supported within defined centres where residential amenity is less likely to be an issue and will be resisted elsewhere. Where homes are situated above such premises, specific care will need to be given to odour extraction, noise insulation and general public convenience. Where appropriate provisions cannot be included then such uses will not be supported, even within designated centres.

Policy R6 Restaurants, Bars and Hot Food Takeaways

1. Outlets should be located within defined centres and will normally be discouraged outside those locations.
2. Proposals within defined centres will be permitted provided they:
   - **a.** would not result in significant harm to the amenity of nearby residents or highway safety;
   - **b.** would not result in harmful cumulative impacts due to the existence of any existing or consented proposed outlet;
   - **c.** are in accordance with the emerging Adopted Hot Food Takeaway Supplementary Planning Document and any subsequent replacement
   - **d.** are compatible with other Plan Policies.

8. Communities

Key evidence

The One Coventry Plan

Playing Pitch and Outdoor Sports Strategy (August 2023)

Indoor Sports Facilities Strategy

University masterplans

Infrastructure delivery plan

Communities Background Paper

Context

8.1 This chapter considers social, community and leisure facilities that are not defined as Main Town Centre uses by the NPPF. These include provisions for sporting uses, including swimming pools, leisure centres and sporting venues, health centres and hospitals, educational establishments including nurseries and universities, meeting places, libraries and places of worship.

8.2 The policies in this chapter set out the approach to safeguarding and improving social, community and leisure premises and providing support for the development of new facilities where there are identified gaps in provision. The policies will support and facilitate the implementation of existing and future strategies for the provision and improvement of social community and leisure premises across Coventry.

8.3 The NPPF also promotes the creation of healthy communities and vibrant and viable town centres both of which help support local communities and provide a focal point for services over and above retailing facilities. The NPPF recognises that these two objectives can complement one another by providing for social, community and leisure uses within designated centres. The provision of such facilities can make significant contributions to the diversification of designated centres, helping to promote sustainable development and sustainable travel through the creation of linked trips and mixed use developments.

8.4 The Council will encourage applications that promote the re-use of existing facilities which support and enhance existing local communities, with a view to protecting those particular features of the neighbourhood valued by its residents.

8.5 It is also recognised that local shopping parades and public houses can play an important role in local communities. Shopping parades sit outside of the ‘centres hierarchy’ because of their small very localised scale. Public houses are classed by the NPPF as ‘main town centre uses’. Yet both shopping

parades and public houses can, in some circumstances perform a broader function in serving a local community and, this needs to be recognised and planning judgement exercised on a case by case basis depending upon local context.

New or improved social and community premises

8.6 In providing social, community and leisure services the NPPF requires local authorities to plan positively for the provision and use of shared spaces, community facilities (such as meeting and sports venues, cultural buildings and places of worship) and other local services to enhance the sustainability of communities and residential environments. In doing so Local Plans should guard against the unnecessary loss of valued facilities and services, allow established facilities to develop and modernise in a sustainable way and ensure that the location of housing, economic uses and community facilities and services are considered and promoted in an integrated way.

8.7 New cultural and community premises (as outlined below) will therefore be considered in accordance with the sequential approach set out in policy CO1. This is with a view to locating facilities in defined centres, making them easily accessible by foot, bicycle or public transport and fully accessible by all sections of the community and facilitating more integrated communities. They should be provided in buildings and facilities which are flexible and adaptable to communities' needs and sited to maximise the shared use of premises to facilitate their longevity.

Local Health Provisions

8.8 As the city's population continues to grow and the needs of the population change in terms of an ageing population, the Council will continue to work with the Integrated Care Board and The University Hospital Coventry and Warwickshire NHS Trust. Although the city's population will remain one of the youngest across the sub-region it is still expected to age, and as such it will be important to ensure new facilities are easily accessible to those who need them.

Cultural and Community Buildings

8.9 Such facilities include sporting uses, including swimming pools, leisure centres and sporting venues, meeting places, libraries and places of worship.

8.10 The Council will seek to bring forward the recommendations of its Sports Strategy and its supporting documents to inspire more people to take up and regularly take part in sport; provide a range of high quality sporting opportunities; and to provide a range of modern, accessible and high quality sports facilities. The Council is also committed to maintaining a library provision

across the city as well managing an appropriate level of other community halls and buildings.

8.11 The provision of places of worship will need to be carefully considered having regard to the needs of local communities and faiths.

Universities, Schools and Educational Facilities

8.12 Coventry's education offer is varied and successful, with a range of improving primary and secondary schools, supported by strong colleges and two of the countries most respected universities. In addition to a number of private institutions the city offers a range of State-funded schools including local authority maintained schools (community, foundation and voluntary aided and controlled schools).

8.13 In order to support sustainable development the Council recognises the importance of maintaining an adequate and appropriate supply of education provision. Opportunities should be taken to ensure schools are located in sustainable locations that complement neighbouring uses. They should be within easy access of local communities as well as offering opportunities to generate linked trips by being located close to other social and community provisions and local retail and service offers as well as being easily accessible by a range of transport options.

8.14 Where possible schools and their grounds should be utilised for other community provisions such as social, cultural, leisure and indoor sports facilities. This will help to develop a schools position at the centre of the community with significant benefits to local residents. It can also help ensure the effective use of resources and help minimise travel distances for users.

8.15 The Council will continue to work with both universities to enable on-going development of their masterplans. This collaborative working will help to facilitate future development proposals and ensure they are in harmony with the overall aims of regeneration, education and investment in Coventry and the sub-region.

8.16 To support compatibility with nearby uses community premises should be appropriate to their surroundings in terms of scale, character and mix of uses, and should not harm residential amenity, the environment, or result in adverse transport impacts in line with other relevant policies. Some facilities within residential neighbourhoods can have an impact on residential amenity which may need to be carefully managed. For example, the hours of operation will need to be balanced against the needs of service providers and users of the premises against impacts on neighbouring residents. Planning conditions will be used, as appropriate, to mitigate potential adverse amenity impacts.

8.17 Proposals should promote active frontages and encourage linked trips and shared services wherever possible. They should satisfy the above sequential approach in order to ensure that centres remain as the focus for not only retailing but also community uses, which ensures that the centre has a diverse mix of uses and addresses where appropriate any unmet local need. It will also be important to locate these provisions in the most sustainable places relevant to the proposed use to generate linked trips and promote sustainable communities.

8.18 It is recognised that there may be occasions where a proposal is not suitable for an in-centre use. This may be due to a number of factors including space requirements, neighbouring uses or local amenity. The Council will require evidence and justification for the reasons why centres have been discounted and why similar uses such as educational facilities, for example, cannot be located in the same locations.

Policy CO1: New or improved social, community and leisure premises

1. Proposals for social, community and leisure facilities will be considered through the following sequential approach:
   - **a.** Designated centres to support the centres hierarchy;
   - **b.** Where no suitable sites are available in a designated centre, an edge-of-centre location;
   - **c.** Where no edge of centre sites are available, a site adjacent to other associated facilities including existing schools and educational facilities;
   - **d.** Only where no suitable site can be identified having regard to points 1-3, will stand alone sites be supported, subject to:
     - **i.** the proposal addressing an unmet meet within a local community;
     - **ii.** there being no significant adverse impact upon the role of a defined Centre;
     - **iii.** there being no material impact on neighbouring amenity.
2. Proposals will be considered on the basis of:
   - **a.** The appropriateness of their proposed location in relation to their scale and intended catchment;
   - **b.** Compatibility with nearby uses;
   - **c.** Accessibility by a choice of means of transport;
   - **d.** Compatibility with other Plan Policies.

3. Where proposals are in accordance with the approved Masterplans for Coventry University or the University of Warwick they will normally be approved subject to high quality design proposals.

Re-use or Redevelopment of Facilities

8.19 There may be circumstances where an existing facility ceases to operate and a site becomes vacant. Under such circumstances the first consideration will be whether there is still a local need for services currently or last provided on that site.

8.20 In order to demonstrate that there is no further need or demand for a building to support social, community or leisure use, applicants should undertake the following measures as a minimum:

- Where appropriate, seek confirmation in writing from the relevant agency that the proposed loss of premises is consistent with the agreed strategy for delivery of that service in the local community and city as a whole;
- In accordance with Appendix 2 of the Local Plan, market the land or premises for D1 or D2 use continuously for a period of at least three months;
- Close to the beginning of the marketing period, notify the Council of the proposed vacancy, so that community organisations, arts, sports and cultural groups seeking premises can be made aware of it.

8.21 Proposals involving the loss of land in use, or previously in use, by an education facility will only be supported, if it is clearly demonstrated to be surplus to educational requirements and its development for other uses would contribute to improvements in the delivery of school places in the city.

8.22 Where replacement facilities are intended, they should be located in accessible locations. The quality of new provision should be equivalent to or exceed what is being replaced.

8.23 Where premises have been registered with the Council as Assets of Community Value under the Localism Act 2011, this will be a material consideration in the determination of applications for change of use to non-community related use.

Policy CO2: Re-Use of or Redevelopment of Facilities

1. Proposals for the re-use or redevelopment of community premises for a use outside the scope of this policy will not be supported if:
   - **a.** There is an outstanding local need which could reasonably be met at that location;
   - **b.** The site remains viable for existing uses or could be made viable through appropriate diversification of use; and

c. the proposal is not compatible with nearby uses.

2. In all cases consideration should be given to the suitability of the location for such facilities having regard to other Policies in this plan and its supporting documents
3. Where replacement facilities are intended, they should:
   a. continue to serve the community;
   b. be of appropriate scale and character;
   c. be of high quality design.

Neighbourhood and Community Planning

8.24 The Localism Act and NPPF provide the framework for Town or Parish Councils and defined neighbourhoods across Coventry to engage in community and neighbourhood planning. This can include a host of activity including Neighbourhood Plans, Parish Plans or other forms of design guidance etc. Where local neighbourhoods wish to engage in the development of local planning policy the Council will help support this process and work with communities to achieve their planning aims, where these are in conformity with the NPPF and the strategic policies of this Plan. Once adopted, a Neighbourhood Plan will form part of the statutory development plan and must be taken in to account in making planning decisions in that locality. Once proposed they will also be referred to within the Council's Local Development Scheme.

Policy CO3: Neighbourhood and Community Planning

1. Where appropriate the Council will support communities in the preparation of:
   a. Parish Plans;
   b. Parish Design Statements, and;
   c. Neighbourhood Plans.
2. When preparing these plans they must remain in accordance with national legislation, this Local Plan and any other city wide planning documents which support it.
3. Where appropriate the Council will support the application and designation of land or buildings as Assets of Community Value.
4. The Council will not support applications for Neighbourhood, Parish Plans or Assets of Community Value where they conflict with this Local Plan or supporting documentation.

9. Green Belt and Green Environment

Key evidence

Coventry and Warwickshire Joint Green Belt Review (2015)

Coventry Green Belt Technical Update (2024)

Strategic Green Infrastructure Study (Coventry, Solihull & Warwickshire) (updated 2024)

Coventry Green Space Strategy (2010)

Coventry Urban Fringe Landscape Assessment & Guidance March 2007

Agricultural Land Classification (2024)

Green Belt and Green Environment Background Paper

Green Belt

9.1 Green Belt policy is set out in the NPPF. Green Belt serves five purposes:

a. to check the unrestricted sprawl of large built-up areas;
b. to prevent neighbouring towns merging into one another;
c. to assist in safeguarding the countryside from encroachment;
d. to preserve the setting and special character of historic towns; and
e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

9.2 National policy sets out stringent criteria for the assessment of proposals for development in the Green Belt to avoid inappropriate development causing harm to the five purposes set out above, not allowing development unless 'very special circumstances' can be demonstrated.

STRATEGIC POLICY

Policy GB1: Green Belt

1. The city's Green Belt boundaries are identified on the Policies Map.
2. Inappropriate development will not be permitted in the Coventry Green Belt unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, in the Green Belt will be assessed in relation to the relevant national planning policy.

Safeguarded Land in the Green Belt

9.3 The NPPF sets the approach to defining the Green Belt boundaries. Its purpose is to help ensure that the Green Belt (as defined in this Plan) endures beyond the Plan period and that defensible boundaries are maintained.

9.4 Through the 2017 Local Plan the Council put a mechanism in place that responded to potential longer term development options in Warwick District meaning its own Plan remained flexible and was able to respond to emerging circumstances in neighbouring areas.

9.5 Land along the southern boundary of Coventry was therefore designated as safeguarded land for consideration as part of the 'next Local Plan review', i.e. the review now taking place. This safeguarding would have explicit regard to development proposals within Warwick District, that if brought forward for development over the course of this Plan period would create Green Belt policy 'islands' which would not meet the five test of Green Belt set out in in the NPPF.

9.6 In this context, these sites were safeguarded as their long term designation as 'Green Belt' is dependent upon the development of adjoining land in a neighbouring local authority. The sites themselves are largely utilised for a small number of low density homes, education provisions or are undevelopable due to the presence of ancient woodlands.

9.7 The 2017 Coventry Local Plan stated that should such development proposals not materialise within Warwick District these sites would be considered for a formal return to the Green Belt due to the issues raised above.

9.8 At the time of writing, proposals are being considered for this neighbouring area through the emerging South Warwickshire Local Plan (SWLP), which is being produced jointly by Warwick and Stratford on Avon District Councils. As the SWLP has not yet reached an advanced stage the land will need to remain safeguarded for the reasons set out in the preceding paragraphs, and its future designation will need to be considered through a future Local Plan update.

STRATEGIC POLICY

Policy GB2: Safeguarded Land in the Green Belt

1. The areas of Safeguarded Land proposed partly or wholly comprise the following sites and are shown on the Policies Map.

a. Land south of Westwood Heath Road;

b. Land south of Bishop Ullathorne School;

c. Playing Field south of Finham Park School; and

d. Land west of Finham Primary School.

Any development of these sites will be subject to consideration through a full or partial review of this Local Plan having explicit regard to development proposals in Warwick District and progress on the South Warwickshire Development Plan.

Local Green Space

9.9 The designation of land as Local Green Space is to protect green areas of particular importance to local communities. Local Green Spaces were formally designated through the 2017 Local Plan and are shown on the Policies Map. The NPPF states that Policies for managing development within a Local Green Space should be consistent with those for Green Belts. Green Belt policy is nationally set through the NPPF and will therefore be applied accordingly to Local Green Space designations.

STRATEGIC POLICY

Policy GB3: Local Green Space

1. The city's Local Green Space boundaries are identified on the Policies Map.
2. Inappropriate development will not be permitted unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, will be assessed in relation to the relevant national planning policy.

Green and Blue Environment

9.10 For the purposes of this plan, the term 'Green Infrastructure' also includes what is sometimes called 'blue infrastructure', that is, various water bodies such as canals and rivers for example. A sustainable growth strategy relies on protecting and improving the quality of the environment. Future development must be located to maximise the efficient use of land, well integrated with existing development, and well related to public transport and other existing and planned Green Infrastructure, so promoting sustainable development.

9.11 Natural England's Green Infrastructure Framework describes Green Infrastructure as generating multiple benefits for people and nature and creates greener, healthier places to live that supports a more productive economy. A Green Infrastructure network can include street trees, green roofs/walls, parks, private gardens, allotments, sustainable drainage systems, through to wildlife areas, woodlands, wetlands and natural flood management functioning at local and landscape scale. Linear Green Infrastructure includes roadside verges, green bridges, field margins, rights of way, access routes, and canals and rivers.

9.12 Improvements can be delivered as part of new development via the planning system, upgrading of existing, and delivering new Green Infrastructure in areas where provision is poor. In the Coventry context, enhancing and increasing green infrastructure is particularly important as some areas are particularly deficient.

9.13 High quality and well-connected green infrastructure has the potential to make Coventry a much more attractive and prosperous city, and a healthier place to live, work and enjoy, with multiple benefits for the economy, the environment and people. Local networks of high quality and well managed open spaces help to create urban environments that are attractive, clean and safe, and can play a major part in improving people's sense of wellbeing. In order to underpin the overall quality of life in all areas and support wider social and economic objectives, the development and maintenance, to a high standard, of a well-connected and multi-functional green infrastructure network, is essential.

9.14 Green infrastructure will also have an important role to play in helping the city adapt to climate change. This will include moderating urban temperatures, storing excess rainfall, increasing surface porosity to ease drainage, providing shade via tree canopies, and providing green oases in urban areas.

9.15 Green Infrastructure provision is currently informed by the City Council's Green Space Strategy, and the Open Space SPD and at a sub regional scale by the Coventry, Solihull and Warwickshire Strategic Green Infrastructure Study.

9.16 In 2021, the Environment Act came into force requiring the development and implementation of Local Nature Recovery Strategies (LNRS), with the LNRS regulations following in April 2023. The boundary for the emerging West Midlands LNRS includes Coventry, Birmingham and the Black Country and this work is being led by the West Midlands Combined Authority (WMCA).

9.17 At the time of writing work is ongoing to prepare a Green and Blue Infrastructure Strategy and Action Plan for Coventry, in line with Natural England's Green Infrastructure Framework and this is at an early stage of preparation. Once adopted by the Council the new strategy, along with the aforementioned LNRS will become a material consideration in the decision-making process.

STRATEGIC POLICY

Policy GE1 Green and Blue Infrastructure

1. The Council will protect and enhance green and blue infrastructure based on an analysis of existing assets, informed by, and contributing to the delivery of the Local Nature Recovery Strategy and the Green and Blue Infrastructure Strategy and Action Plan or its future equivalent.

2. New development proposals should make provision for green and blue infrastructure to ensure that such development is integrated into the landscape and contributes to improvements in connectivity and public access, biodiversity, landscape conservation, design, archaeology and recreation, demonstrating how this links to the wider delivery of the Local Nature Recovery Strategy and the Green and Blue Infrastructure Strategy and Action Plan.

3. Coventry's existing and planned network of green infrastructure should be used as a way of adapting to climate change through the management and enhancement of existing and new habitats. The creation of new habitats will be supported wherever possible to assist with species movement, to provide a source of locally grown food through allotments and community gardens, to provide sustainable and active travel routes for people, to provide shade and counteract the urban heat island effect, and to assist in improving public health and wellbeing.

4. New development will be expected to maintain the quantity, quality and multifunctionality of existing green and blue infrastructure. Where quantity is not retained, enhancement to quality is expected. Where the opportunity arises, and in line with the city's most up-to-date Green and Blue Infrastructure Strategy and Action Plan, the Council will also expect new developments to enhance green and blue infrastructure, and create and improve linkages between individual areas. Any development which is likely to adversely affect the integrity of a green corridor will be required to be expressly justified and where appropriate, mitigation measures put in place.

5. A key element of Coventry's approach to green and blue infrastructure will be the continued development of a network of green spaces, water bodies, paths and cycle ways, with priority given to those parts of the city where there is an identified deficiency of green space. Where a development proposal lies adjacent to a river corridor or tributary, a natural sinuous river channel should be retained or, where possible, reinstated. Culverts should be removed unless it can be demonstrated that it is impractical to do so.

6. Development must respect the importance of conservation, improvement and management of green infrastructure in order to complement and balance the built environment. A strategic network of green and blue infrastructure already exists in the city, connecting natural heritage, green space, biodiversity, historic landscapes water bodies and other environmental assets, together with links to adjacent districts in Warwickshire and Solihull. This strategic network will be safeguarded and enhanced by:

   a. Not permitting development that compromises its integrity and that of the overall green and blue infrastructure framework (including the Coventry/Oxford Canal);

b. Using developer contributions to facilitate improvements to its quality, connectivity, multifunctionality and robustness;

c. Investing in enhancement and restoration where opportunities exist, and the creation of new resources where possible, such as linking green and blue infrastructure to other forms of infrastructure;

d. Improving its functionality, quality, connectivity and accessibility;

e. Ensuring that a key aim of green and blue infrastructure is the maintenance and improvement and expansion of biodiversity;

f. Integrating proposals to improve green and blue infrastructure in the delivery of new developments, particularly through area based regeneration initiatives and major proposals and schemes;

g. Flood risk management and improving surface water quality, with preference being given to nature-based solutions where possible.

Green Space

9.18 In order to address health inequalities and to promote healthier lifestyles, people need to have good access to a range of parks, open spaces, indoor and outdoor sports and recreational facilities. These spaces also add to the quality of the environment. This includes formal sports provision such as playing fields and play areas, as well as more informal areas of open space suitable for general relaxation, children's play, walking and cycling.

9.19 The Council has adopted a Green Space Strategy, which sets out minimum local standards for green space provision. It sets out the provision standards for the various categories of open space looking at quantity, quality and accessibility. There is also a set of quality standards for each of the provision standard categories. The same green space can sometimes contribute to more than one category in the standards. This will ultimately be superseded by the emerging Green and Blue Infrastructure Strategy and Action Plan for Coventry.

Policy GE2: Green Space

1. Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation, or it can be demonstrated that:

a. An assessment showing there is no longer a demand, or prospect of demand, for the recreational use of the site or any other green space use; or

b. A deficiency would not be created through its loss, measured against the most up-to-date Coventry Green Space standards; or

c. The loss resulting from any proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location of the city.

2. The loss of sports provision will be considered in line with the approach set out in the NPPF and the Councils most up to date evidence including the Playing Pitch and Outdoor Sports Strategy.

3. To support the proposed allocations at H2:19 and JE2:4 the following sites are allocated for the provision of new sports pitches:

a. Land at Charter Avenue (former Alderman Harris School site).

b. Land east of Coundon Wedge Road.

4. Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.

Biodiversity, geology and landscape

9.20 Planning legislation places a biodiversity duty of care on all local and public authorities, emphasising that development plan policies and planning decisions should be based upon up-to-date information about the environmental characteristics of their area. These characteristics include the relevant biodiversity and geological resources of the area. In reviewing environmental characteristics, the Council will continue to assess the potential to sustain and enhance these resources.

9.21 Connectivity between sites and buildings, and resilient and robust ecosystems, which are adaptable to change, are essential to ensure retention of existing levels of biodiversity and to enable these to be enhanced wherever possible. As part of new development this could be achieved through well designed gardens, green roofs or landscape features. Resilient and functioning ecosystems support a range of human population needs, including flood management, control of atmospheric pollution, and access to green space.

9.22 In order to restore good levels of biodiversity across the Warwickshire, Coventry and Solihull sub-region, it is important to have urban areas that are permeable for wildlife, with havens for wildlife through the city and connected corridors linking sites. Green and blue infrastructure planning and implementation can contribute strongly to fulfilling this. Biodiversity will be promoted as a core component of sustainable development and landscapes for living, underpinning social, health, environmental and economic benefits, together with community well-being and local quality of life.

9.23 As set out in the text supporting Policy GE1, work is being undertaken to prepare a Local Nature Recovery Strategy, and more locally a Green and Blue Infrastructure strategy is to be prepared for Coventry.

9.24 Biodiversity Net Gain (BNG) became mandatory from 12th February 2024.The aim is that when developments are proposed, proposals ensure that habitats for wildlife are left in a measurably better state than they were before the development. Legislantion requires that developers must deliver a BNG of 10%.

9.25 Through site selection and layout, developers should avoid or reduce any negative impact on biodiversity. They must deliver at least 10% BNG, as measured by the statutory biodiversity metric. There are 3 ways a developer can achieve BNG. They can create biodiversity on-site (within the red line boundary of a development site). If they cannot achieve all of their BNG on-site, they can deliver through a mixture of on-site and off-site. If neither can be achieved then as a last resort they can buy statutory biodiversity credits from the government. The steps must be followed in order. Further information can be found on the government website, and local guidance is contained in the Biodiversity SPD which will be updated.

Policy GE3: Biodiversity, Geological, and Landscape Conservation

1. Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced. Proposals for development on other sites, having biodiversity or geological conservation value, will be permitted provided that they protect, enhance and/or restore habitat biodiversity. Development proposals will be expected to ensure that they:

a. lead to a minimum 10% net gain of biodiversity, by means of an approved ecological assessment of existing site features and development impacts, and the creation or enhancement of habitats, urban greening features such as green walls and roofs, and/or the implementation of species specific features such as bird and bat boxes;

b. protect or enhance biodiversity assets and secure their long term management and maintenance;

c. avoid negative impacts on existing biodiversity;

d. preserve species which are legally protected, in decline, are rare within Coventry or which are covered by national, regional or local Biodiversity Action Plans.

2. Where this is not possible, the net gain must be delivered off site. Only if evidence demonstrates that insufficient gains cannot be made to meet the 10% requirement will statutory credits be allowed to be purchased.

3. Biodiversity will be encouraged particularly in areas of deficiency, in areas of development and sustainable urban extensions, and along wildlife corridors. Opportunities will be sought to restore or recreate habitats, or enhance the linkages between them, contributing to the delivery of the Local Nature Recovery Strategy and the Green and Blue Infrastructure Strategy and Action Plan or its future equivalent. Protected Species, and species and habitats identified in the Local Biodiversity Action Plan, will be protected and conserved through a buffer or movement to alternative habitat. Identified important landscape features, including Historic Environment assets, trees protected by preservation orders, individual and groups of ancient trees, ancient and newly-planted woodlands, ancient hedgerows and heritage assets of value to the locality, will be protected against loss or damage.

Further detail will be provided in an updated Biodiversity SPD. In the case of archaeological remains, all practical measures must be taken for their assessment and recording.

Trees

9.26 Trees make a valuable contribution to the city's green landscape. New developments should seek to retain existing trees and other landscape features, incorporating them into a high quality design and landscape proposals where possible. Should loss be unavoidable, compensatory provision of new trees should be proposed as part of a well-designed landscape scheme or within other areas of green space within the local community. This will ideally be within 400m of the site to reflect the distance recommended within the Green Space Strategy. All replacement trees should also be of an appropriate type and status to reflect those which have been lost.

9.27 Trees that are already subject to protection either as part of an Ancient Woodland (as shown in Appendix 4) or through a Tree Preservation Order should be retained for the value they add to the visual amenity of the area, as such development proposals should retain protected trees.

9.28 In exceptional circumstances where the benefits of development are considered to outweigh the benefit of preserving protected trees, development will be permitted subject to adequate compensatory provision being made. This could take the form of replacement trees or a financial contribution equivalent to the value of the removed tree(s). Further details are provided in the Trees and Developer Guidance SPD.

Policy GE4: Tree Protection

1. Development will be positively considered provided:

   a. there is no reasonably unavoidable loss of, or damage to, existing trees or woodlands during or as a result of development. Any proposed loss must be supported by a tree survey;

   b. trees not to be retained as a result of the development are replaced with new trees as part of a well designed landscape scheme; and

   c. existing trees worthy of retention are sympathetically incorporated into the overall design of the scheme including all necessary measures taken to ensure their continued protection and survival during construction.

   d. recommendations within the Coventry Trees and Development Guidelines SPD have been fully considered.

   e. proposals are in accordance with the requirements of planning national legislation

2. Development proposals that seek to remove trees that are subject to 'Protection', without justification, will not be permitted.

10. Design

Key evidence

Green Space Strategy (2019-2023)

Sustainable Urban Extensions Design Guidance SPD

Householder Design Guide SPD

New Residential Development Design Guide SPD

Tall Buildings Design Guide and View Management Framework SPD

Design Guidance on Shopfronts for Conservation Areas and Historic Buildings

Design Background Paper

Context

10.1 The city's built and natural environments reflect the public realm or public face of Coventry. They are integral in creating a positive image and help create a sense of place, shaping cultural identities and helping to instil civic pride. They play an important part in improving the health and wellbeing of the population and can help mitigate the impacts of climate change. Furthermore they can play an important role in helping to attract investment, visitors and encourage tourism.

10.2 In all cases well designed, safe and well-maintained streets and public spaces can help encourage walking and cycling and can reduce anti-social behaviour and crime including the perception and fear of crime for all in the community. Furthermore, creating routes and spaces that are green, through the use of trees, living walls, green roofs and other types of green infrastructure, will not only enhance the quality and attractiveness of the city but will also contribute to ecological diversity.

10.3 The Council wants to significantly raise the standard of design in the built and green environments as good design assists in the creation of sustainable and inclusive communities and can improve the quality of people's lives. Furthermore, good design can help to reduce some of the environmental inequalities between the more deprived neighbourhoods and the rest of the city.

10.4 This Local Plan will ensure that development follows an effective design process, which assesses the physical, social and economic context, evaluates options and involves affected groups of people.

10.5 Opportunities to reflect existing materials and characteristics as part of new developments should be the starting point of any design proposals. Where there is no established character, or the character is poor quality there will be a clear and justifiable need to bring about improvements and enhancement to the

existing built and natural environment. As such, proposals which demonstrate high quality design; reflect the requirements of policy DE1 and would reflect a significant enhancement of the built environment may be considered acceptable even where they divert from current characteristics.

10.6 Policy DE1 requires development proposals to create safe and attractive streets and public spaces, which reduce crime and the fear of crime. As well as considering the impact of development proposals on public safety and the incidences of anti-social behaviour, the reference to safety in the Policy also relates to creating buildings and places that are better protected from terrorist attack, this reflects the Government's strategy for countering terrorism. Applications for development which affect higher risk buildings or spaces such as those that could attract crowds of people, should always fully consider the advice provided by National Counter Terrorism Security Office (NaCTSO) or future equivalent.

10.7 To support the importance of promoting high quality design across Coventry a series of design SPDs have been adopted and a series of design codes will be developed to guide high quality and contextually responsive design across the City.

STRATEGIC POLICY

Policy DE1 Ensuring High Quality Design

1. All development proposals should follow a design-led approach to deliver sustainable, high quality placemaking. Development should contribute positively to the wellbeing of existing and new communities, the quality of the surrounding built and natural environment, and should be planned and designed with reference to the climate change strategy and the adaptation and resilience strategy.

2. The setting, integrity and character of heritage assets will be protected in accordance with Policy HE2.

3. Where buildings in excess of 20m in height are proposed, these must be informed by the guidance of the Tall Buildings SPD.

4. In and around the City Centre, the location of proposed development must be considered in relation to the identified views of the City's three spires, and the tall buildings design guide and view management framework SPD.

5. All development will be expected to meet the following key principles:

a. respond to the physical context of the site;

b. consider the local distinctiveness and identity of the site but also have regard to opportunities to enhance the local built and natural environment through new development and enhanced design;

c. where appropriate, retain and incorporate into the layout the protection of important views, including key views of the three spires;

d. preserve or enhance the character and setting of the historic built, landscape and where appropriate archaeological environment;

e. preserve or enhance the character and setting of major road, rail and canal corridors;

f. clearly define the boundaries between public and private spaces and enclosure of space;

g. provide attractive, safe, uncluttered, active and easily identifiable, high quality public spaces;

h. consider the safety and security of new and existing users, showing how these considerations have informed the design process;

i. make places that inter-connect and are easy to move through;

j. ensure places are easily understood by users, with clear routes and distinct physical features;

k. seek high quality design and attention to detail in the layout of developments, individual buildings and infrastructure in terms of function and impact, not just for the short term, but over the lifetime of the development;

l. be adaptable to changing social, technological, economic and market conditions and ensure that developments maximise the use of the site;

m. promote diverse, viable places;

n. be proactive in responding to climate change and adopt sustainable and low carbon construction principles in terms of their design, layout and density;

o. consider green infrastructure at the earliest stage in the design process, to ensure that it is well planned, designed, managed and maintained. It should also be well integrated and serve multiple purposes (as appropriate);

p. support the integration of through routes for public transport and incorporate suitable bus priority measures as appropriate;

q. minimise adverse impact on important natural resources;

r. conserve and enhance biodiversity; and

s. respect and enhance landscape quality including trees, hedges and other landscape features of value.

t. Ensure that car parking is integrated into the development in a convenient, accessible manner and does not dominate the development and its surroundings or cause safety issues;

u. Provide safe, secure, convenient and accessible provision for cycle parking and storage, facilities for waste management, recycling and collection in a manner that is appropriately integrated within the overall development;

6. Development located in areas covered by Coventry City Council Design Codes, must demonstrate compliance with the Design Codes key principles.

7. Outline major applications located in areas not subject to a Coventry City Council Design Codes, will be required to submit a Design Code to assess compatibility with local context.

10.8 The public realm is essentially the network of routes and spaces that connect the city together. They are like the arteries of the city and the better they operate the better the city functions. These routes and spaces are usually but not always fronted or bounded by development, and they contribute to the city in different ways. Whatever the type of route they all need to be designed to ensure they are safe for all users, attractive, accessible and pleasant to use. Through-city and city-wide routes are very important at conveying the image of the city to those merely passing through and creating good first impressions of the city to vehicle-borne visitors alike. Whilst local and neighbourhood routes are fundamental in ensuring that the city is a pleasant and attractive place to live and work.

10.9 Coventry has a strong legacy of public art, particularly from the post war period where public art formed an integral part of the redevelopment of the city. It is an important element in defining the character and identity of the city centre, be it landmark pieces such as the Whittle Arches or small more intimate pieces such as the Niad or historically important pieces such as the Coventry tapestry located in St Mary's Guildhall.

10.10 To build on this legacy, public art will be encouraged to be incorporated into buildings and public spaces. Furthermore, public art will be encouraged along transport corridors, gateways and pedestrian and transport nodes.

10.11 Wherever possible, development proposals should look to incorporate existing landscape features – landform, trees, hedges, water bodies etc. These should be used to inform and guide how a development is designed and they should be incorporated in a way that ensures they will contribute positively to the development and surrounding area.

10.12 Like the routes and spaces, the buildings that front them must positively contribute to the built environment. They need to be designed to enhance their

immediate location and the city as a whole. They should be energy efficient and incorporate sustainable technologies to help combat climate change. They should also be designed to be safe and easy to use by all members of the community, including people with restricted mobility.

10.13 Design proposals relating to landscaping, public realm and green spaces should also be prepared in accordance with the Green Environment and Environmental Management policies of this plan. Any sites brought forward within or immediately adjacent to a Conservation Area or which has an impact on the setting of a listed building should also be considered in accordance with the heritage policies of this plan.

10.14 Good design also includes careful consideration of the physical process of redevelopment and ensuring that steps are taken to mitigate any negative impacts during the process of redevelopment. The City Council therefore expect that where site hoarding is required these are of high quality and informed by local context, whilst opportunities for meanwhile uses to be accommodated on sites should also be explored to retain vibrancy and activity within areas of redevelopment.

10.15 High quality design also requires understanding of a sites context and the wider role in local townscape, this is particularly of importance where development sites are located in areas of mixed urban character and typology, Sites brought forward for redevelopment should therefore demonstrate how they have been informed by local character and an understanding of how the site contributes toward the wider townscape.

DE2: Delivering High Quality Places

1. Public Realm

a. Where relevant, all development proposals will be required to integrate high quality soft and hard landscape designs.

b. The palette of materials and street furniture for any development proposal will need to respect the prevailing character of its respective area or adjoining landscape.

2. Public Art

a. Public art should, where appropriate, form an integral part of the design process of development proposals.

b. As an alternative to stand-alone pieces of public art, opportunities should be taken to incorporate this into the design of the buildings e.g. through the use of artist/architectural glass or ironmongery etc. thus giving it more legitimacy and integrity.

c. Established public art shall be retained within redevelopment proposals unless the benefits of its removal outweigh the harm of its loss. Where public art is lost replacement works shall be incorporated into new development unless robust justification is provided highlighting that this it is not viable.

d. Where public art is provided, contributions and commuted maintenance sums for up to 10 years will be required and include the cost of decommissioning where appropriate.

3. Lighting

a. Lighting should be carefully considered in order to meet the requirements of creating attractive and safe environments for all, whilst also mitigating impacts upon neighbours and ensuring that lighting does not adversely affect biodiversity.

b. Carefully considered architectural lighting proposals for new buildings and refurbishment of existing buildings will be encouraged to enhance the overall appearance of the city during the hours of darkness.

4. Designing for Healthy Communities

Major development proposals must fully consider how physical and mental health and well-being for people of all abilities and ages has been considered and catered for. For residential developments of 10 units and above, proposals should include access to high quality open space and nature, the provision of attractive walking and cycling routes, play facilities, seating, and spaces for all mobility's to interact, with well-connected permeable layouts that incorporate desire lines.

5. Meanwhile Uses

a. Vacant plots/sites planned for redevelopment must investigate provision of meanwhile/temporary uses prior to commencement of any redevelopment work. Any meanwhile/temporary use of such sites will be appropriate where:

i. the meanwhile/temporary use does not preclude permanent use of the site, particularly through the length of any temporary permission;

ii. the proposed meanwhile/temporary use contributes to the function of the area where it is located or meets a specific need identified by the Council;

iii. potential adverse amenity impacts are prevented or mitigated; and

iv. the proposed use meets all other Local Plan policies relevant to the use.

b. Site hoardings must be of high quality and responsive to their context.

c. The use of high-quality accessible landscape areas will be welcomed for plots which may remain vacant for periods greater than 6 months.

6. City Centre and Transition Zone

a. In line with other plan policies, proposals located within the City Centre Transition Zone*, should fully consider their local context and the sites role in transitions to the City Centre context.

b. Proposals within the defined City centre** and the City Centre Transition Area* should demonstrate how they contribute to the key aims and objectives of Coventry City Council.

*City Centre Transition Zone as shown at Appendix 9(d)

**City Centre boundary as shown at Appendix 9(d)

11. Heritage

Key evidence

The Coventry Historic Environment Record (HER)

The National Heritage List for England

The Coventry Local List of Buildings of Historic and Architectural Interest

Coventry Heritage at Risk Register

The Gould Report on the 20th Century City Centre (2009)

The Coventry Historic Landscape Characterisation (2013)

Spon End and Nauls Mill Area of Local Distinctiveness (2003)

Conservation Area Appraisals and Management Plans

Design Guidelines for Development in Coventry's Ancient Arden (1995)

Design Guidance on Shop fronts for Conservation Areas and Historic Buildings (2014)

Heritage Background Paper

Context

11.1 Coventry has a rich and diverse historic environment which is evident in the survival of individual historic assets and in the local character and distinctiveness of the broader landscape. Prehistoric flint tools which have been collected from fields around the city demonstrate that there has been human activity in the Coventry area since at least the Mesolithic period, some 10,000 years ago.

11.2 The landscapes and buildings that can be seen today predominantly date from the medieval period onwards when Coventry grew from a small Saxon settlement to become one of the principal cities of medieval England. The wealth of the medieval city peaked in the 15th century and was followed by a slow economic decline that saw Coventry stagnate until a second period of dramatic expansion occurred in the late 19th century with the emergence of industries such as ribbon weaving and watch making. Twentieth century Coventry became a major centre for manufacturing and the city grew rapidly with factories and housing expanding over the previously rural landscape absorbing many of the surrounding villages and farms. The concentration of industry in Coventry resulted in it suffering from extensive bombing during World War II, causing significant damage to the fabric of the city. However the wartime destruction was followed by an era of extensive reconstruction with innovative architecture and design in the 1950s and 60s.

Conservation Areas

11.3 Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty on local planning authorities to designate as Conservation Areas any 'areas of special architectural or historic interest the character and appearance of which it is desirable to conserve or enhance'. The Act also requires local planning authorities to review their Conservation Areas from time to time and designate extra areas where appropriate. Appraisals and Management Plans need to be produced for all Conservation Areas. Therefore, areas of the city considered to have special architectural or historic interest or where the character and appearance of an area is of a desirable status to conserve or enhance, will be continually reviewed over the plan period to identify if further areas of the city may warrant conservation area designation in compliance with the approach set out in national policy.

STRATEGIC POLICY

Policy HE1 Conservation Areas

1. The areas listed below have been designated as Conservation Areas under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and are detailed on the Policies Map:

   a. Allesley

   b. Chapelfields

   c. Coventry Canal

   d. Far Gosford Street

   e. Greyfriars Green

   f. Hawkesbury Junction

   g. High Street

   h. Hill Top

   i. Ivy Farm Lane

   j. Kenilworth Road

   k. Lady Herbert's Garden and The Burges

   l. London Road

   m. Naul's Mill

   n. Spon End

   o. Spon Street

p. Stoke Green

q. Earlsdon

r. Brownshill Green

2. Conservation Area Appraisals and Management Plans will be produced for all of the Conservation Areas to guide their preservation and enhancement. All development proposals within Conservation Areas will be determined in accordance with this Plan and the appropriate Appraisal and Management Plan.

Conservation and Heritage Assets

11.4 Coventry has over 400 Listed Buildings ranging from the medieval St Mary's Guild Hall to the 1962 railway station that have been selected by the Government as being of national importance. In addition over 280 buildings have been selected by the Council for Local Listing due to their importance to Coventry. The city also has 18 Conservation Areas (, 20 Scheduled Monuments, 4 Registered Parks and Gardens and thousands of other archaeological sites, historic structures and features recorded on the Coventry Historic Environment Record.

11.5 Where it is considered necessary, the Council may propose buildings for Listing by national government and will also continue to enhance and maintain an up-to-date Coventry Local List of buildings of historic and architectural interest.

11.6 Where heritage assets are present on sites allocated for housing in Policy H2, the Council will seek to secure their retention and conservation through legal agreements.

11.7 In addition to the national Historic England Heritage at Risk Register the Council will maintain the Coventry Heritage at Risk Register and work with property owners and developers to reduce the number of heritage assets in Coventry that are deemed to be at risk. The Council will use its statutory powers where necessary to secure the preservation of listed buildings with Urgent Works and Repairs Notices. To reflect their historic importance, scale and strategic proximity to the city centre, the sites of Charterhouse and the London Road cemetery are to be designated as a Heritage Park. This is considered further in Policy HE3.

11.8 The Council will continue to maintain an up-to-date and accessible Historic Environment Record as the principal evidence base on the city's Historic Environment. Historic Landscape Characterisation and the Arden Design Guidance will be used to inform decisions on historic character and local distinctiveness.

STRATEGIC POLICY

Policy HE2: Conservation and Heritage Assets

1. In order to help sustain the historic character, sense of place, environmental quality and local distinctiveness of Coventry, development proposals will be supported where they conserve and, where appropriate, enhance those aspects of the historic environment which are recognised as being of special historic, archaeological, architectural, artistic, landscape or townscape significance. These Heritage Assets include:
   - **a.** Listed Buildings and Locally Listed buildings;
   - **b.** Conservation Areas;
   - **c.** Scheduled Ancient Monuments and Archaeological sites;
   - **d.** Registered Parks and Gardens; and
   - **e.** Other places, spaces, structures and features which may not be formally designated but are recognised as significant elements of Coventry's heritage and are positively identified on the Coventry Historic Environment Record.
2. Proposals likely to affect the significance of a heritage asset or its setting should demonstrate an understanding of such significance using currently available evidence.
3. Development proposals involving heritage assets in general and listed buildings in particular, should acknowledge the significance of the existing building and the area by means of their siting, massing, form, scale, materials and detail.
4. The sympathetic and creative re-use of heritage assets will be encouraged, especially for heritage that is considered to be at risk, so long as it is not damaging to the significance of the heritage asset. The embodied energy present in historic buildings contributes to sustainability.
5. The Council will use its statutory powers to secure the preservation of buildings and other heritage assets that are deemed to be at risk by the national and local heritage at risk registers.
6. Demolition or destruction of heritage assets will be resisted; proposals to demolish a heritage asset will therefore need substantial justification. The greater the damage to the significance of the asset, the greater the justification required and the public benefit needed to outweigh such damage.
7. All proposals should aim to sustain and reinforce the special character and conserve the following distinctive historic elements of Coventry:
   - **a.** The surviving buildings, defences and street plan of the medieval city centre and its suburbs;

b. The surviving pre-industrial settlements and landscape features which have been subsumed by the expansion of the city such as Walsgrave, Canley, Binley, Brownshill Green, Coundon Green, Little Heath (Spring Road), Stivichall Croft and Lower Eastern Green (at Dial House Lane);

c. The wider Arden rural environment on the fringe of the city comprising field-systems, ancient woodlands and commons which developed over centuries; interspersed with a mix of settlements, farmsteads and smallholdings;

d. Buildings associated with the city's industrial heritage; ribbon weaving, watch making, cycle making, motor car manufacturing, brick making, coal mining, synthetic textiles, munitions, aeronautical engineering, canals and railways;

e. The Victorian and Edwardian suburbs such as Earlsdon and Stoke;

f. Designed landscapes, including historic parks and gardens (both registered and locally listed), historic cemeteries, churchyards and public parks;

g. The significant elements of Coventry's ground-breaking post-war reconstruction including its plan, built form, public art works and public spaces; and

h. The city centre primary shopping area, respecting the architectural design principles of the significant elements of the post- World War II reconstruction such as Broadgate and the shopping Precincts.

8. Where material change to a heritage asset has been agreed, recording and interpretation should be undertaken to document and understand the asset's archaeological, architectural or historic significance. The scope of the recording should be proportionate to the asset's significance and the impact of the development on the asset. The information and understanding gained should be made publicly available, as a minimum through the Coventry Historic Environment Record.

9. For development in relation to heritage assets and / or in conservation areas, these should demonstrate how the relevant Historic England Good Practice Guidance has been taken into account.

10. In exceptional cases, where harm cannot be outweighed by public benefit and where proposals produce harm to the setting of heritage assets which cannot be mitigated, the Council may seek contributions from developers for the enhancement, repair and/or maintenance of the impacted historic assets.

Heritage Park Charterhouse

11.9 Through the Local Plan and partnership working, the Council are maintaining and further promoting the creation of a City Heritage Park in the Sherbourne Valley and the grounds of the Charterhouse and London Road Cemetery. The designation reflects the historic significance of the two sites as well as their

scale and strategic proximity to the city centre. There is also wider connectivity opportunities associated with the River Sherbourne. Proposals which positively contribute to the park will be supported, along with measures to improve linkages to the area and improve accessibility between the city centre and the Charterhouse grounds. These may include a riverside walkway along the exposed section of the River Sherbourne, connecting Far Gosford Street with Charterhouse along the west side of the river crossing Gulson Road and Humber Avenue, alongside a footpath and cycle route along the former Coventry loop line railway and a new pedestrian crossing on the London Road. These enhancements, in connectivity and green infrastructure, could facilitate comprehensive regeneration opportunities of brownfield land along the River Sherbourne, most notably between Gulson Road and Gosford Street and in Harper Road that will complement this part of the city. The City Heritage Park and its key routes and linkages are identified on the inset map at Appendix 5. The wider area will be supported by a Masterplan.

11.10 In addition, opportunities should be taken to improve the setting of the Charterhouse, the naturalisation of the river valley and the views through to the viaduct

11.11 These areas should then be proactively re-naturalised or appropriately landscaped, adding to the Heritage Park where appropriate and further improving the quality of environment within the Local Green Space designation to the West of the River. The Local Green Space should be supported by defensible boundary lines created as part of the Master planning process and brought forward in partnership working.

Policy HE3 Heritage Park – Charterhouse

1. Proposals which support the City Heritage Park in the grounds of the Charterhouse and London Road cemetery will be supported along with measures to improve linkages to the area along the River Sherbourne (between Charterhouse and Far Gosford Street), the former Coventry loop railway line and across the London Road. Proposals that are detrimental to the heritage park and the improvement of linkages will be resisted.
2. The Heritage Park and any expansion of Blue Coat School should be guided by a comprehensive Master plan, which reflects the policies of this Plan (including Appendices).

Archaeology

11.12 In order to be responsive to the historic character and local distinctiveness, proposals which are inclusive of intrusive groundworks are expected to

conserve and, where appropriate, enhance archaeological features across the City.

11.13 Archaeological assets which must be carefully considered include:

- Scheduled Monuments
- Known archaeological sites
- Areas of Archaeological Constraint
- Other places, spaces, structures and features which may not be formally designated but are recognised as significant elements of Coventry's archaeological heritage and positively identified on the Coventry Historic Environment Record
- Prehistoric human habitation to the modern period.

11.14 In considering proposals for development, the City Council the validation checklist will set out what is will usually be required including:

a) an initial assessment establishing the archaeological significance of the site to be submitted as part of any planning application.
b) where appropriate an archaeological evaluation and subsequent publication of results to be carried out prior to commencement, where, as a result of the initial assessment, important archaeological remains are likely to be present.
c) preservation in situ to be the preferred approach
d) justification together with appropriate mitigation before allowing any harm to, or loss of, the significance of a heritage asset.

Policy HE4 Archaeology

1. In order to be responsive to the historic character and local distinctiveness, proposals which are inclusive of intrusive groundworks are expected to conserve and, where appropriate, enhance archaeological features across the City.
2. Where material change to an archaeological asset has been agreed, recording and interpretation must be undertaken to document the asset's historic significance and advance understanding of the asset to be lost. The scope of the recording should be proportionate to the asset's significance and the impact of the development on the asset. The information and understanding gained should be made publicly available, as a minimum through the Coventry Historic Environment Record.
3. Archaeological investigations must be undertaken where development is proposed on or adjacent to the line of the former site of the City Wall. Positive weight will be given to schemes which incorporate design responses to reflect and respond to the line of the medieval City Wall.
4. New development which include or take place adjacent to the remaining above ground sections of the medieval City Wall, must enhance the setting of the wall and seek to incorporate it into design.

5. In cases where loss cannot be avoided, the Council may seek contributions from developers for the enhancement, repair and/or maintenance of archaeological assets in the vicinity of the propos

12. Accessibility

Key evidence

Coventry Transport Strategy (2022 – 2037)

Transport Background Paper 2024

Coventry Area Strategic Model (CASM) 2024

Coventry Local Air Quality Action Plan

Coventry Connected SPD

Context

12.1 The transport background paper sets out the context and linkages to a range of local, regional and national strategies and action plans.

12.2 In addition to enabling everyday activities such as accessing work, education, shops and leisure facilities, transport can also have a significant influence on peoples' health and wellbeing and overall quality of life. Transport is also an enabler of economic activity, providing connections between people and jobs, access to markets and business supply chains.

12.3 Individual transport needs can vary significantly. It is therefore important to ensure that everyone who lives in, works in or visits the city is able to access a choice of accessible and high quality transport modes and make well informed and appropriate decisions about how and when they travel.

12.4 Coventry's existing transport network generally works effectively, however there are a number of important wider challenges to address:

- The dominance of the car in the context of a compact growing city with a high proportion of short local car trips which discourages physical activity, thus promoting less healthy lifestyles.
- Relatively low levels of cycling, and to a lesser extent walking and public transport usage for local trips, especially for trips to school and work.
- Low levels of accessibility and a high reliance on access by car to some edge of city employment and retail sites.
- Road congestion on some major road corridors, primarily during peak periods, which can negatively affect economic growth and air quality.

- The impact of the car in the street environment such as obstructive on-street parking, road safety and general street clutter.
- Working towards achieving current road casualty reduction targets and making our roads safer for all.
- The need for improved strategic connectivity to surrounding areas which are economically linked to Coventry.

12.5 Public health is also a key consideration. A citywide Air Quality Management Area (AQMA) was declared in Coventry in 2009 due to significantly high levels of air quality emissions. Research demonstrates that emissions from road transport are the principal source of elevated concentrations of Nitrogen Dioxide (NO2) which causes poor air quality. The main transport corridors to the North and North East of Coventry (linked to the M6) are identified as being most likely to exceed the NO2 standard. Noise is another issue which impacts upon health, as set out in the environmental Management chapter of this plan but which is also cross referenced here.

12.6 The development and expansion of the city provides an opportunity to address these issues through investment in the existing transport network, and by ensuring that new developments cater for the accessibility needs of a diverse, forward looking low carbon city. This includes opportunities for the promotion of intelligent mobility and more active and environmentally sustainable modes of travel such as walking and cycling, public transport and ultra-low emission vehicles such as electric cars. Well linked and attractively designed, connected, safe and accessible green and blue infrastructure routes can play a key role in encouraging active lifestyles by walking, by mobility aids such as wheelchairs and by cycling for example.

12.7 There are already a number of positive initiatives taking place including a successful programme of investment in transport networks across the city. This includes a successful programme of public realm enhancements in the city centre, targeted investment to address congestion along a series of busy road corridors and the delivery of a substantial programme of cycle routes.

12.8 The need to enhance accessibility within the city is underpinned by a wider objective to strengthen accessibility across Coventry and Warwickshire and with neighbouring areas in the East and West Midlands. This approach recognises the established economic travel to work area and reinforces opportunities to enhance business connectivity and supply chains.

Accessible Transport Network

12.9 In order to create a prosperous and attractive city, local people must have good access to the jobs and services they need. This can only be achieved if the transport network offers a wide choice of convenient, affordable, accessible and

reliable transport modes which meet the needs of the varying types of trips which people need to make.

12.10 The principles adopted in this reviewed development plan promote the utilisation of accessible brownfield sites with additional housing being met through the development of Sustainable Urban Extensions (the SUEs were allocated in the adopted 2017 plan and these are now underway).

12.11 The use of brownfield sites will:

- Make sustainable travel options, such as walking and cycling more attractive options for local trips;
- Help to focus development towards accessible locations making it easier for local people to access employment, education and skills, shops and leisure facilities and reduce the distance people need to travel;
- Support higher density development proposals which will help support the viability of public transport services

STRATEGIC POLICY

Policy AC1: Accessible Transport Network

1. The Council will encourage proposals that minimise the need to travel, maximise trips made by sustainable transport modes, incorporate liveable neighbourhood principles and reduce the dependence on the private car in accordance with the National Design Guide, National Model Design Code, Transport for West Midlands (TfWM) Local Transport Plan (LTP) and the Council's Transport Strategy and Coventry Connected SPD.

2. Sustainable transport modes should be fully integrated into the design and placemaking of developments to ensure sustainable and active travel is a real and long term alternative. As a result, proposals will be supported where:

a. The proportion of trips made by walking, cycling and public transport is high, and local connections by these modes are improved;

b. Car dominance is reduced;

c. Streets and the public realm are made safer, more accessible and where the quality and resilience are improved such as through materials and increasing biodiversity; and

d. Air quality, noise, and green and blue infrastructure are improved to create more attractive neighbourhoods for people.

3. Development proposals which are expected to generate additional trips on the transport network should:

a. Integrate with existing transport networks including roads, public transport and walking and cycling routes through safe, accessible and sustainable links to promote access by a choice of transport modes.

b. Consider the transport and accessibility needs of everyone living, working or visiting the city. Special attention should be paid to the needs of disabled people, young children, and people with special needs. Special attention should be paid to the needs of an aging population to make Coventry an Age Friendly City.

4. Support the delivery of liveable neighbourhoods and new and improved high quality local transport networks which are closely integrated into the built form. This includes networks which support access to strategic growth corridors. The scale of measures required should be appropriate to the scale and impact of the proposed development.

5. Where appropriate, support the provision and integration of emerging and future intelligent mobility infrastructure, including Very Light Rail, Demand Responsive Transport, micro-mobility, Connected Autonomous Vehicles (driverless cars), autonomous delivery and drone technology.

Road network

12.12 Coventry is well connected to the national road network having good access to the A46/M40, M69, M6, M45/M1 and M42. Highways England manage the strategic road network which surrounds Coventry and is crucial to its national connectivity needs. This includes the A46 corridor which has been designated as an Expressway in the Highways England Road Investment Strategy. This busy corridor is already benefitting from major investment at Tollbar Island to introduce a grade separated underpass. Further improvements are planned at Brandon Road and Walsgrave near the B4082 to introduce grade separation to improve traffic flow. Further enhancements are likely to be necessary within the plan period, such as the A46/ Stoneleigh Road junction located in Warwickshire, which supports access to several major employment sites within Coventry including the University of Warwick and Westwood Business Park. Future capacity enhancements on the strategic highway network which support Coventry's economic growth proposals will be supported.

12.13 Coventry's well maintained and managed local highway network is considered to be an asset for the city which should be protected. The historic evolution of the city has left a legacy of a concentric web of radial roads enabling direct linkages between the strategic road network and the Coventry ring road. Recent improvements to the road network as part of a major Pinch Point programme has helped to address local congestion hotspots and improve traffic flows, most notably on the A45 and A4600 corridors.

12.14 The Key Route Network is made up of main metropolitan roads - operating at agreed performance standards. This network will serve the main strategic demand flows of people and freight across the metropolitan area, and provide connections to the national strategic road network. It will also serve large local flows which use main roads and provide good access for businesses reliant on road based transport and will use highway capacity effectively to cater for movement by rapid transit and core bus routes, cyclists, Heavy/Light Goods vehicles and private cars to support growth on key corridors.

STRATEGIC POLICY

Policy AC2: Road Network

1. New development proposals which are predicted to have a negative impact on the capacity and/or safety of the highway network should:

   a. Mitigate and manage the traffic growth which they are predicted to generate to ensure that they do not cause unacceptable levels of traffic congestion, highway safety problems and poor air quality. Highway mitigation and management measures should focus firstly on demand management measures (Policy AC3) including the promotion of sustainable modes of travel, and secondly on the delivery of appropriate highway capacity interventions. Highway capacity interventions should be appropriate to the scale of development and expected impact and will be determined through the associated Transport Assessment.

   b. Developments should seek to support and accommodate, where appropriate, measures which facilitate enhancements to the wider transport network including those set out in the Infrastructure Delivery Plan. Be served by routes which are suitable for that purpose. Where this is not achievable, proposals will only be considered acceptable if appropriate interventions can be applied to suitably mitigate any negative impacts, including the construction of new access link roads.

2. Development will be expected to actively support the provision and integration of intelligent mobility infrastructure, such as electric vehicle charging points and include rapid charging points, car club schemes and bicycle hire infrastructure. These should be provided onsite unless justification shows that off site is the only feasible option.

3. New development proposals that require changes to the highway network will be required to positively integrate with and have consideration of the movement of people and goods on the existing road network, including walking, cycling and rapid transit routes in accordance with Policy AC4 and AC5.

4. Proposals should not negatively impact road safety and should be in line with the Council's Transport Strategy.
5. The Infrastructure Delivery Plan sets out specific measures and funding sources for the transport network improvements which are required to support the delivery of the Local Plan. The Council may seek to secure the provision of transportation infrastructure through planning conditions and legal agreements.
6. Further guidance will be contained in the Coventry Connected SPD and the emerging Transport Design Guide.

Demand management

12.15 Highway resilience and journey time reliability are essential to supporting the needs of local businesses and the economic prosperity of the city. Coventry's existing highway network generally copes well with traffic incidents and peak flows; however congestion still exists in some areas during the peak period.

12.16 Evidence shows that a large proportion of existing peak car traffic consists of trips which start and finish within the city and are over relatively short distances, often less than two miles. As a priority, sustainable modes of travel will be promoted to reduce single occupancy car use for short journeys. However, it is recognised that as the city grows and the population and the number of jobs increase, other demand management measures will become increasingly important to maintain the integrity of the network.

12.17 The primary tools to achieve this are:

- Transport Assessments;
- Travel Plans;
- Car parking standards; and
- Urban Traffic Management and Control.

12.18 **Transport Assessments** - New developments will need to be considered on a case by case basis to determine the accessibility requirements by all transport modes, the anticipated levels of traffic generated and the impact this would have on the highway network. Transport Assessments will be required for larger developments which create significant additional trips on the network, and will be used to determine the severity of the impact, including congestion and road safety, and the appropriate type and level of mitigation required.

12.19 **Travel Plans** - Travel Plans play an essential role in encouraging sustainable transport and flexible and agile working practices to support the management and generation of traffic associated with trip attractors such as local businesses, schools, universities, hospitals, railway stations and new residential developments. They are the first step in mitigating transport related issues before implementing physical road infrastructure measures.

12.20 Travel Plan support can be provided by the Council and TfWM on the cheapest and most sustainable ways to travel including journey planning, ticket advice and any travel support.

12.21 Travel Plans should be updated regularly and monitored to maximise their effectiveness against agreed objectives and targets. Where applicable, these should be closely linked to Transport Assessments to act as a monitoring tool and action plan.

12.22 **Car Parking** – The provision of car parking can influence:

- The generation of traffic and the potential for congestion.
- Occurrences of inappropriate on-street parking which can:
- Block access routes for emergency, refuse and delivery vehicles;
- Block footways preventing access for pedestrians;
- Impact negatively on the street scene; and
- Reduce visibility for all users at junctions causing safety issues.
- The ability to encourage sustainable transport modes.
- The visual impact of car parking on the built environment

12.23 New developments will therefore be expected to provide appropriate levels of car parking in order to address these issues. Local car parking standards are set out in appendix 6 of the Local Plan. They have been developed based on NPPF criteria, locally determined accessibility criteria and benchmarking of other Local Authorities.

12.24 Detailed standards have been developed for areas outside of the city centre including car parking standards for new residential and business development. The provision of car parking in the city centre will be determined on a site-by-site basis. The objective of this approach is to discourage the excessive provision of private car parking in the city centre because:

1. Adequate levels of publicly available car parking are already provided across the city centre.
2. The city centre is highly accessible compared to other parts of the city, so can be easily accessed by more sustainable non-car modes of transport.
3. Development in the city centre is proposed to be of a much higher density; but this would not be achievable if high levels of private parking are provided.

12.25 The car parking standards also include requirements for the provision of electric car charging and cycle parking infrastructure.

12.26 Developments which result in changes to the location or supply of publicly available car parking in the city centre the policy sets out the requirements and justifications necessary to ensure that a consistent and appropriate

supply of public parking is maintained to support new development proposals without having an unsustainable oversupply. This includes proposals to replace some existing surface level car parks with multi-storey car parking.

12.27 Proposals will be required to encourage and incentivise sustainable travel such as through the provision of mobility credits.

12.28 Urban Traffic Management Control (UTMC) - The on-going development of the UTMC system combined with the application of Intelligent Transport System (ITS) technologies will continue to be used to manage traffic on the highway network. Any new traffic control infrastructure required to support new developments must be compatible with, and where appropriate, link into the established UTMC network.

Policy AC3: Demand Management

1. Transport Assessments will be required for developments which generate significant additional trips on the transport network. Thresholds for their requirement will be based on locally determined criteria set out in the Coventry Connected SPD.
2. Travel Plans will be required for new developments which generate significant additional traffic movements. Detailed guidance on the requirement for Travel Plans will be set out in the Coventry Connected SPD.
3. Proposals for the provision of car parking associated with new development will be assessed on the basis of parking standards set out in Appendix 6, with active and sustainable travel modes factored into the delivery of any new parking provision.
4. Development proposals which result in significant changes to the location or supply of public car parking spaces will be required to address any associated necessary changes to associated car park signing and management systems. In regard to development proposals in the city centre:
    - this should include clear justification as part of an on-going strategic review process and shown to have an acceptable impact on the performance and accessibility of the city centre and overall car parking provision.
    - The redevelopment and improvement of surface level car parks will be prioritised.
    - The provision of new surface level car parking will not be supported within the city centre unless its provision is to support the implementation of longer term regeneration schemes. In such cases surface level provision will only be allowed on a temporary basis.
    - New car parking should be accommodated in a multi-storey format.

- Proposals for multi storey car parks should respect the charter and scale of the surrounding environment and maximise opportunities for high quality aesthetics.
- Parking needs and the role of the car will also be balanced with promoting the use of public transport, cycling and walking.

5. Proposal will be required to encourage and incentivise sustainable travel, such as through the provision of Mobility Credits.
6. New development proposals which require changes to the highway network will be required to integrate with any existing Urban Traffic Management Control (UTMC) and Intelligent Transport Systems (ITS) infrastructure and strategy and development of the Key Route Network.
7. Further guidance will be contained in an updated Coventry Connected SPD.

Active Transport Provision

Walking and Cycling

12.29 The Council is placing a high priority on promoting walking and cycling (as reflected in the Coventry Transport Strategy) to help reduce road traffic congestion and carbon and air pollution, but also to improve the physical and mental health of residents. Perhaps the most significant advantages which are offered by these active travel modes are the physical and mental health benefits. Regular counts of private and public transport trips into the centre of Coventry show that between 2011 and 2021 light vehicles (including cars and taxis) consistently accounted for around 75%-80% of trips. Levels of cycling are particularly low, accounting for only 1% of journeys into the centre of Coventry and between 1% and 4% of residents' journeys when they are commuting, escorting children to school or travelling to their own place of education.

12.30 Coventry has a reasonably well-developed cycling and walking network which has benefited from recent initiatives including the city centre public realm programme and the Cycle Coventry project, introducing new cycle routes around the city. These schemes have helped to make a positive contribution towards the creation of an environment which encourages sustainable and active modes of travel. The Council will build on the successes and momentum gained from these projects and intends to implement additional phases of them in tandem with the growth of the city to help encourage residents to make more journeys by bike.

12.31 The expansion of safe cycling and walking networks will be delivered via a wide range of schemes, set out in the Council's Transport Strategy and will comprise physical measures to create an environment where walking and cycling are the preferred modes of transport. This concept will be prioritised

through the development of SUE sites. Further guidance is set out in the Coventry Connected SPD and such measures may include:

- segregated cycleways on key corridors;
- School Streets - temporary road closures around schools at pick up and drop off times;
- Liveable Neighbourhoods;
- Traffic calming and speed reductions;
- Wider pavements;
- Increased cycle parking; and
- expanding the provision of the West Midlands Cycle Hire scheme.

12.32 The West Midlands Cycle Charter also aims to raise cycling levels, and deliver change. The charter sees cycling as playing an important role in addressing the challenges the West Midlands face, which include reducing congestion, carbon and pollution, supporting economic growth and employment, tackling obesity and creating places where people want to live, work, learn, shop and do business. The Cycle Charter also supports a Metropolitan Cycle Network which will be integrated with local cycle networks. Opportunities will be sought to deliver additional phases of the network as part of new development proposals. For larger developments, financial contributions may be required which support the enhancement of cycle routes on the wider highway network which are consistent with the IDP and local cycling strategy. High quality cycle parking should also be provided at new sites and along the wider public transport network at interchanges and stations.

12.33 Development proposals should also be in accordance with the emerging Local Cycling and Walking Infrastructure Plan (LCWIP) in terms of incorporating safe, comfortable, convenient and accessible walking and cycling routes that create an environment which encourages walking and cycling when designing schemes both through the site and which link seamlessly to the existing pedestrian and cycling route network. This may require the upgrade of existing routes, facilities, cycle parking lightings, crossing, etc. or the creation of new routes and infrastructure.

12.34 Proposals will also be expected to support the provision of West Midlands cycle hire bike and docking stations to help expand the network across the city.

12.35 In terms of developments in the city centre and adjacent to it, they should, where appropriate, upgrade pedestrian and cycle routes that incorporate improvements to crossing the ring road to enhance connectivity to the city centre from the wider city.

12.36 The type of provision should be determined based on the expected level and speed of traffic and the location and type of development proposal. In accordance with the Manual for Streets cyclists should generally be accommodated on the carriageway in areas with low traffic volumes and speeds. Dedicated off-carriageway infrastructure will be required alongside

more heavily trafficked routes and at intersections. Opportunities will also be sought to develop cycle routes through areas of greenspace which provide opportunities for leisure cycling and direct quiet routes to surrounding areas and amenities. Other supporting measures such as advanced stop lines, directional signage and lighting form an important part of the cycle network and will be expected to be integrated into all major development proposals.

12.37 In terms of pedestrians, in many circumstances off-carriageway footways will generally be the preferred option. However, in quieter residential areas, within the city centre and areas where the ratio of pedestrians to traffic is high it may be appropriate to provide shared pedestrian / vehicle surfaces which encourage higher levels of interaction between different travel modes. On more heavily trafficked routes, pedestrian priority measures such as controlled crossing points will be required to make walking as safe and convenient as possible.

12.38 Cycle parking, in combination with shower/changing and clothing storage facilities are an essential part of supporting the needs of cyclists and should be catered for. Cycle parking standards are set out in the car parking standards in Appendix 6. The Coventry Connected SPD includes a local strategy for cycling which includes guidance on requirements for cycle route provision, and other supporting infrastructure requirements. This needs to include cycle parking for children's bikes as set out in Appendix 6, particularly at playgrounds and outside shops.

Policy AC4: Active Transport Provision including Walking, Cycling and Micro Mobility

1. Development proposals should be in accordance with the emerging Local Cycling and Walking Infrastructure Plan (LCWIP) and incorporate:

a. safe, comfortable and convenient access to walking and cycling routes, appropriate for all abilities and needs that include wheelchair accessible routes, consideration of pedestrian desire lines within and outside site boundaries, pedestrian and cycle crossings and improvements and links to the city's towpaths;

b. new and upgraded pedestrian and cycle routes where these links do not exist, which are in accordance with national guidance on standards and best practice. These must appropriately link and integrate seamlessly into established networks to ensure that routes are continuous, and they should include connecting to the public transport network, interchanges and stops to deliver seamless integration together with provision of high quality cycle parking. The expected type of provision will depend on the scale, use and location of the site. Upgraded pedestrian routes should include, for development proposals in the city centre where appropriate, improvements to the significant routes and linkages as shown in Figure 8 and where appropriate, development proposals will be required to incorporate

improvements to crossing the Ring Road to ensure enhanced connectivity between the city centre and the wider city for pedestrians and cyclists and should reflect the priorities in the supporting text above. This will be of particular relevance at:

- Ring Road Junctions 1, 2, 4 and 5
- The Canal Basin crossing between Ring Road junctions 9 and 1
- Connectivity between Parkside and Much Park Street.

c. High quality cycle parking (for residents, employees and visitors), which includes provision for children's bikes, larger bikes like cargo bikes and associated facilities, such as changing, showers and storage in line with the cycle parking standards in Appendix 6; and

d. the provision for West Midlands Cycle Hire docking stations(s) and hire bikes on site for larger development proposals.

2. For larger developments, financial contributions may be required to support improved pedestrian and /or cycling routes on the wider network.

3. The Council will promote walking and cycling by delivering a wide range of walking and cycling schemes. This includes schemes set out in the Council's Transport Strategy and will comprise physical measures to create an environment where walking and cycling are the preferred modes of transport. Such measures may include:

- segregated cycleways on key corridors;
- School Streets - temporary road closures around schools at pick up and drop off times;
- Liveable Neighbourhoods;
- Traffic calming and speed reductions;
- Wider pavements;
- Increased cycle parking; and
- expanding the provision of the West Midlands Cycle Hire scheme.

These measures will be prioritised within existing areas of the city which are negatively affected by increased traffic associated with new development. Proposals should incorporate such measures and financial contributions will be sought to deliver those proposals where the predicted impact of development traffic is significant and measures are needed to support an improved pedestrian and cycle environment.

Bus, Demand Responsive Transit and Rapid Transit

Bus Services and Infrastructure

12.39 Buses offer a realistic modal choice for many local trips, and particularly those into the city centre. Bus network coverage across the city is generally good although there are some examples of where service frequencies are inadequate to provide an attractive and realistic option, such as more peripheral edge of town employment sites.

12.40 Coventry's Bus Network Development Plan and bus policies as highlighted in the Strategic Transport Plan demonstrate the importance of a partnership approach with TfWM. This will be vital in providing high quality bus services to new developments.

12.41 To ensure bus travel is an attractive and convenient option, new development must comply with TfWM access standards and be expected to have access to a bus stop within 400m, with regular service patterns serving the city centre. It is accepted that this may not be practicable for small scale development proposals in more remote parts of the city but developers will be encouraged to liaise with the Council and TfWM to ensure access standards are fully met. For larger development sites, in particular those in more peripheral locations, it will be important that bus services are fully integrated into the whole sites footprint with provision made to accommodate appropriate bus infrastructure including bus shelters and passenger information. Through routes for buses along with suitable bus priority measures should also be provided wherever possible and the Council will work in consultation with developers, bus operators, TfWM and the Passenger Transport Executive to achieve this.

12.42 The existing bus network primarily follows the radial network of roads across the city, and whilst this supports good access to the city centre, it does not necessarily support the demand for orbital trips such as those between residential and edge of town employment sites. More recently operators have introduced orbital services which have helped to address this issue. The West Midlands Strategic Transport Plan sets out a strategy for a core bus network which is closely integrated with a high frequency rail and rapid transit network to enhance connectivity to other strategic centres across the West Midlands.

Interchange, Information and ticketing

12.43 One of the major barriers to encouraging public transport is the need to interchange between different modes and services, often paying separately each time at the point of use, and often with inadequate prior knowledge of when and where the next service will be. A step change is required in the quality of public transport provision which will require complementary measures to:

• Improve the ease of access to interchange facilities and to the quality of the waiting environment within them;

• Provide quality and timely information, both at bus stops and remotely via mobile devices, that can reduce uncertainty for travellers;

• Make payment quick and convenient through the introduction of integrated ticketing systems and cashless smart payment methods which work across all modes and services.

Rapid Transit

12.44 In order to manage congestion to acceptable levels and maintain network resilience throughout the plan period, additional public transport provision will be required. To support jobs-led growth in the city, it is apparent that the current public transport network will not adequately address all of additional demands, or meet the expectations of the modern business sector. It is clear that a step change is required to remedy this, and the development of a high quality rapid transit system provides an appropriate and viable solution.

12.45 The West Midlands Strategic Transport Plan sets out comprehensive network of rail and rapid transit routes across the Metropolitan area including a new Rapid Transit network for the Coventry area.

12.46 The Council's preferred way to deliver rapid transit is the Very Light Rail system and development proposals which are expected to create significant numbers of additional trips on the network, and are located in close proximity to a proposed rapid transit route should seek to make provision for those routes including new infrastructure to facilitate the integration of the rapid transit network into the development site. The level of need and expected provision will be determined through Transport Assessments and Travel Plans.

12.47 Major trip generators such as the city centre, Ansty Park, Whitley Business Park, the Universities and the Hospital will be a priority for the provision of high quality rapid transit services. Routes will also serve Coventry main railway station and other transport interchanges to enable close integration with local and national transport networks. Options are also being considered for improved public transport connectivity to proposed HS2 interchange and the UK Central proposal in Solihull through the HS2 Connectivity Package. The identification and feasibility of individual routes will be subject to further study and delivered through the Coventry Connected Transport Strategy and the West Midlands Strategic Transport Plan.

12.48 In addition to supporting the needs of existing employment sites, rapid transit also provides a way of unlocking potential development growth sites by significantly improving accessibility. The high quality, fast and reliable

nature of rapid transit increases the viability and attractiveness of services and offers a realistic alternative to local car journeys.

Policy AC5: Bus, Demand Response Transit and Rapid Transit

1. New major development proposals should have safe and convenient access to the existing bus network and comply with the TfWM access standards. In areas where this is not achieved, new development may be required to include the provision of appropriate bus infrastructure to enable services to be fully integrated into the development site. Development proposals should also have regard to, and where appropriate, make provision for the development of Mobility Hubs. The level of need and expected provision will be determined through Transport Assessments and Travel Plans.
2. The Council will support new bus and rapid transit networks that link communities more directly to places of work, education, essential services, centres, other sustainable transport modes and leisure / recreational / cultural attractions. This includes new or improved routes around the city and new and improved cross boundary routes outside the TfWM area.
3. The provision of demand response transit will be supported within all areas of the city as a convenient alternative for many people, including those less able.
4. The development of a rapid transit network, such as in the form of Very Light Rail will be supported to improve accessibility to existing and new major trip attractors. Major development proposals which are expected to create significant numbers of additional trips on the network, and are located in close proximity to a proposed rapid transit route should seek to make provision for those routes, including new infrastructure to facilitate the integration of the rapid transit network into the development site. The level of need and expected provision will be determined through Transport Assessments and Travel Plans.
5. Further details will be set out in the Coventry Connected SPD, the TfWM LTP and TfWM Bus Service Improvement Plan.

Rail

12.49 Building on its core rail connectivity assets, including excellent rail links on the West Coast Main Line (WCML) between Coventry, London and Birmingham, the Council has developed an ambitious evidenced base in the Coventry Rail Investment Strategy (2013). The strategy sets out a clear case for the need to radically improve rail services which support the economic travel to work area such as services on the north-south corridor between Coventry, the Thames Valley, Warwickshire and the East Midlands. Allied to this, the Council is investing in the delivery of the Coventry Station Masterplan which will result in improved integration between rail and other

modes of transport and the adjacent Friargate regeneration scheme. The delivery of the Coventry Station masterplan redevelopment will improve transport interchange facilities, including facilitating the delivery of the NUCKLE rail scheme and enable the predicted growth in rail passengers to be accommodated. The scheme has already provided improvements to pedestrian accesses, car parking, bus interchange facilities and cycle parking.

12.50 Existing stations at Tile Hill and Canley predominantly cater for local rail services between Coventry and Birmingham, although Tile Hill offers some longer distance journey options as far as London. Both stations also act as rail Park and Ride facilities, although the car parks continue to operate at, or near capacity. Measures which address capacity issues will be supported including better integration with bus and rapid transit networks, walking and cycling routes and appropriate capacity enhancements to station car parking.

12.51 Additional local rail stations on the WCML to the east of the city serving Willenhall and Binley would allow some of the strong local rail service demand to be met and support the regeneration and economic growth of this part of the city. However, this will need to be considered in the context of wider strategic rail industry plans which plan for capacity on the busy WCML. Options are also being explored for a new station in the south of the city to support new development growth. These stations are also identified in the West Midlands Strategic Plan. Line capacity between Coventry and Birmingham is constrained which causes competition between fast long distance and local stopping services. It is clear that major infrastructure improvements will be required to meet the growing demands to support the growth of the city. Proposals to expand capacity on the WCML which support Coventry's rail connectivity objectives will be supported.

High Speed Rail (HS2) and West Coast Main Line (WCML)

12.52 The construction of the high speed railway (HS2) between London and Birmingham is continuing to progress. It will include a new station located close to Birmingham International station approximately four miles from the western boundary of Coventry. Solihull Metropolitan Borough Council is promoting a masterplan called UK Central (UKC) which includes plans to create up to 100,000 new jobs and new housing growth.

12.53 It will be important that Coventry is well connected to UK Central and able to form part of a broader UK Central Plus economic offer supported by excellent highway and public transport services. This will enable Coventry to continue to develop and be a major sub-regional hub for growth supporting services and economic activity across the whole area. For example, significant benefits could be gained through improved connectivity to high

profile employers and development sites which are located on linked economic growth corridors including the A45 / A46 and M6 including the University of Warwick, Jaguar Land Rover and the area around Whitley and Coventry airport. Existing constraints along these corridors may impede the demands of potential growth and it is likely therefore that measures may be required to improve connectivity along new and improved transport corridors in or adjacent to Coventry. Proposals which enhance that connectivity will be supported.

12.54 The construction of HS2 is likely to affect service patterns on the WCML to reflect the introduction of new high speed services. It will be important that existing services which support the local growth agenda are protected, and opportunities are seized which support improved connectivity objectives in the Coventry Rail Investment Strategy.

Policy AC6: Rail

1. Proposals which improve the quality of local rail services and access to stations and rail interchange facilities will be supported. These include:
   a. Improved access to rail stations, including HS2, by all modes of travel;
   b. Improved interchange facilities between rail and other modes; and
   c. Enhancements on the rail network which increase the frequency and quality of rail services which serve Coventry.
2. Measures which support the delivery of objectives in the West Midlands Rail Executive Rail Investment Strategy and Midland Connect Strategic Transport Plan for improved rail connectivity will be supported. This includes measures which facilitate improved rail services and supporting rail infrastructure, including further electrification of the rail network, on the Coventry north-south corridor between Leamington, Kenilworth, Coventry, Bedworth and Nuneaton and on routes to Leicestershire and the East Midlands.
3. Proposals for additional local railway stations on the east-west and north/south rail corridor within Coventry will be supported where they are proven to be viable, support growth objectives and are consistent with the relevant national, regional or local rail strategies.
4. Further details are set out in the Coventry Connected SPD, West Midlands Rail Executive Rail Investment Strategy and Midland Connect Strategic Transport Plan.

Freight

Road Freight

12.55 The efficient movement of freight is essential to support economic growth. In addition to supporting existing businesses, freight movements provide opportunities to generate additional employment through the creation of logistical and freight industries. The central location of Coventry and its high level of access to the strategic route network strengthens this opportunity.

12.56 On-street lorry parking, particularly around major employment and distribution sites, can create highway safety issues. These issues arise through a combination of factors such as specific delivery slots resulting in vehicles waiting on-street, and a lack of dedicated onsite HGV parking. Where new developments are expected to require large numbers of lorry movements, appropriate parking and turning facilities must be provided onsite to minimise disruption on the public highway and on sites with 24 hour operations, overnight HGV parking and facilities (such as toilets and showers) should be provided.

12.57 It is also important that new developments demonstrate that they can function without requiring HGVs to travel on smaller, residential roads. This is in the interest of highway safety and to reduce congestion and air pollution in line with the Council's Future Highway Network Plan. To aid this, the Council will support, where appropriate, proposals for Freight Consolidation Centres, in appropriate edge of centre locations, close to the strategic road network, to reduce volumes of HGV/LGV traffic with the city.

12.58 Developments will be expected to provide for and make provision for sustainable delivery methods, such as e-bikes, cargo bikes and autonomous delivery methods and other emerging technologies as alternatives to deliveries made by vehicles.

Rail Freight

12.59 There is currently limited scope for additional rail freight access within the city. Opportunities for additional facilities which arise within the plan period will generally be supported, but will need to be assessed on their individual merit and be consistent with the relevant rail industry plans.

Policy AC7: Freight

1. New developments on sites which generate or are likely to generate significant HGV movements will be supported where they:

a. accommodate appropriate on-site lorry parking and turning facilities to minimise disruption and safety issues on the public highway.

b. Where they have 24 hour operations, provide overnight HGV parking and facilities such as toilets and showers;

c. Can demonstrate that they can function without requiring HGVs to travel on smaller, residential roads, in line with Policy JE5.

d. Submit a delivery and servicing plan that includes a method for monitoring trips to and from the site.

2. Freight consolidation and distribution centres will be supported in appropriate edge of city locations close to the strategic road network to reduce the volume of HGV/LGV traffic within the city and where they provide appropriate welfare facilities for drivers as well as employees.

3. Where appropriate, the Council will support proposals that utilise sustainable delivery methods and make provision for them, such as e-bikes, cargo bikes and autonomous delivery methods and other emerging technologies.

4. New development which supports the use of rail and air freight facilities will be supported where there is an evidenced demand, proposals are consistent with the relevant air and rail industry plans, have an acceptable environmental impact and do not significantly compromise the capacity and safety of the local highway network.

13. Environmental Management

Key evidence

Strategic Flood Risk Assessment 2022

Climate Change Strategy 2024

Water Cycle Study 2024

Carbon Policy Support 2024

Heat Network Zoning 2023

West Midlands Metropolitan Area Local Aggregate Assessment Report

Coventry Air Quality Management Area Order, 2009

Coventry's Municipal Waste Management Strategy 2008-2020

Environmental Management Background Paper

Planning for climate change

13.1 The impacts of flooding, overheating and other consequences of climate change have the potential to hinder the creation of vibrant, healthy and sustainable communities in Coventry. The outcomes of climate change will also have serious impacts on vulnerable and deprived communities and those least able to respond.

13.2 Coventry City Council's One Coventry Plan (2022-2030)[1] sets out a vision for the city which includes three delivery priorities, one of which is tackling the causes and consequences of climate change. This is supported by the Council's draft Climate Change Strategy[2], which details the Council's ambitious commitments to transition to net zero by 2050 and become a leading city for the green industrial revolution.

13.3 Without comprehensive action, climate change will severely limit economic growth. However, the approaches now required present a significant opportunity to deliver a decarbonised and resilient economy that supports job creation. Through the Climate Change Act 2008 and as a signatory of the Paris Agreement, the UK Government has committed to:

a. reduce emissions by at least 100% of 1990 levels by 2050; and

[1] https://www.coventry.gov.uk/onecoventryplan

[2] https://www.coventry.gov.uk/climate-change/tackling-climate-change/2

b. contribute to global emissions reductions aimed at limiting global temperature rise to well below 2°C and to pursue efforts to limit temperatures to 1.5°C above pre-industrial levels.

13.4 Local planning authorities are bound by the legal duty set out in Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by the 2008 Planning Act, to ensure that planning policy contributes to the mitigation of and adaptation to climate change. According to guidance issued by the Town and Country Planning Association and the Royal Town Planning Institute (updated in 2023),

13.5 Chapter 14 of the NPPF addresses the duty of planning in helping to contend with a changing climate and the vulnerabilities it generates in the built and natural environments. This includes planning for zero and low carbon development, requiring renewable and low carbon energy supply, reducing emissions and greenhouse gases, the mitigation of flood risks and employing appropriate policy and design solutions to address rising temperatures, ventilation, the need for additional green infrastructure and the protection of the natural environment. The NPPF states that plans should take a proactive approach to mitigating and adapting to climate change. Development should be planned for in ways that help eliminate greenhouse gas emissions, such as through consideration of its location, orientation and design. As part of this approach, the opportunity to reduce carbon in both the fabric of new buildings and the generation of related energy has also been taken into account.

13.6 The West Midlands Combined Authority declared a climate change emergency in June 2019. In July 2019, it committed to net zero carbon emissions by 2041. This means that the region will be working towards meeting these targets through the timescale of the Coventry Local Plan Review plan period.

13.7 A Net Zero Routemap has been produced for Coventry by Professor Andy Gouldson, a lead Climate Advisor for the UK Infrastructure Bank. The Routemap sets out the results of analysis that assesses past, present and projected energy use and carbon emissions from the different sectors in Coventry and explores different options for achieving net zero in Coventry. Given that the domestic and commercial properties account for 45% of the city's total carbon emissions, it is critical that there is a step change in the city's approach to future development to support the transition towards net zero. It is therefore vital that the Coventry Local Plan Review supports this scale of ambition and provides a policy framework to deliver more sustainable development.

13.8 Changes to Part L of Building Regulations came into effect in June 2022, which introduced a carbon reduction improvement of c.31% for all major

developments. The changes also significantly improve energy efficiency standards for new homes and further improvements under the "Future Homes Standard" are anticipated during the Plan period. However, given the urgency of the climate change crisis and the amount of development anticipated across the Plan period, it is vital that use of energy from non-renewable sources by new homes, and other types of development, is minimised as far and as early as possible, until overtaken by any further revision of Building Regulations.

13.9 To help increase the use and supply of renewable and low carbon energy and heat, the Council policy provides a positive strategy for energy from these sources. The policies set out how energy infrastructure will be considered, including how opportunities for decentralised energy[3] and district heating[4] will be identified.

13.10 In definition of Grey water the local plan considers this to be water from baths, showers, and hand basins for toilet flushing, irrigation, or washing machine supply.

STRATEGIC POLICY

Policy EM1: Planning for Climate Change Adaptation

1. Development is required to be designed to be resilient to, and adapt to the future impacts of climate change through the inclusion of the following measures:

a. using layout, building orientation, construction techniques and materials and natural ventilation methods to mitigate against rising temperatures and address overheating in new buildings;

b. optimising the use of multi-functional green infrastructure, including tree planting for urban cooling, local flood risk management and shading;

c. incorporating water efficiency measures, such as the use of grey water and rainwater recycling, low water use sanitary equipment to achieve a water efficiency target of 100l/pd to be achieved using a fittings-based approach;

[3] Energy that is generated close to where it will be used, rather than at an industrial plant and sent through the national grid, including micro-renewables, heating and cooling. It can refer to energy from waste plants, communal or district heating and cooling, as well as geothermal, biomass or solar energy. Decentralised heat or power networks can serve a single building or a whole community, even being built out across entire cities.

[4] A system that distributes heat or hot water from a central source to a group of residential or commercial buildings through a network of underground pipes carrying hot water. Heat networks can be supplied by a range of sources including energy-from-waste (EfW) facilities, combined heat and power (CHP) plants and heat pumps. The advantages include cost savings, higher efficiencies and carbon emission reductions.

d. minimising vulnerability to flood risk by locating development in areas of low flood risk and including mitigation measures including SuDS in accordance with Policy EM4 and EM5;

e. Where applicable, maintain and enhance the canal network to reflect the canals' role in urban cooling;

f. seek opportunities to make space for water and develop new blue infrastructure to accommodate climate change challenges;

g. major developments must consider making connections available to the Coventry Heat Network in areas identified as Heat Network Zones;

h. development must meet net zero (regulated operational carbon) for residential and non-domestic development including the need to address embodied carbon and waste;

i. demonstrate how the concept of water neutrality has been addressed in relation to the potential to provide a benefit in improving resilience to climate change and enabling all waterbodies to be brought up to 'Good' status; and

j. Larger residential developments (including new settlements), and commercial developments should consider incorporating greywater recycling and/or rainwater harvesting into development at the master planning stage to reduce water demand.

2. Set out how the requirements of the policy have been complied with including justification for why the above measures have not been incorporated.

3. Where justification for non-compliance with the requirements is based on viability, this will need to be clearly demonstrated through an open book financial appraisal.

Note on Policies EM2 (Building Standards) and EM3 (Renewable energy)

13.11 Policies EM2 and EM3 from the 2017 adopted plan have been deleted and a suite of new policies (EM11-EM14) have been introduced later in this chapter.

Water Quality and Flood Risk

13.12 It is important to apply this policy in the context of the Council's Local Flood Risk Management Strategy and Surface Water Management Plan to ensure that all links are made to the aims and objectives of these plans. This will help ensure that the areas identified as at risk of flooding, either fluvial or surface water, are fully considered where applications in such areas are received.

13.13 In accordance with the NPPF, the overall aim of this policy is to direct development away from areas of high flood risk and avoid inappropriate development in areas at risk of fluvial and pluvial flooding. Where development cannot take place in areas of low flood risk, a sequential test should be applied in which it is acknowledged that extensive areas of built development fall into the high risk areas and that the re-use of previously developed land may be needed to avoid economic stagnation. Where in the wider overall interest, development is supported as an exception to this policy with high risk areas, applicants will need to demonstrate that they strictly comply with all criteria of the policy.

13.14 The Environment Agency have produced a local area climate change guide which sets out how they would expect climate change to be considered in applications. The most up to date indicative flood zone maps are available from the Environment Agency directly. Additional information may be obtained by contacting the Council's Flood Risk Management and Drainage team, in addition to the maps that accompany the SFRA.

13.15 All major developments must be assessed in respect of the level of flood risk from all sources taking into account the impact of climate change. If development in areas at risk of flooding is the only option following the application of the sequential test, it will need to consider the following:

- the type of development is appropriate to the level of flood risk associated with its location with reference to Coventry's Strategic Flood Risk Assessment (SFRA) flood zone maps (as amended) and/or a site specific flood risk assessment, as set out in Table 2 in the Flood Risk and Coastal Change section of the National Planning Practice Guidance (NPPG).
- the type of development must be appropriate both at the time permission is sought and at the end of the lifetime of the development, taking into account the latest climate change guidance.

Policy EM4 Flood Risk Management

1. All developments must be assessed in respect of the level of flood risk from all sources, taking into account current and future impacts of climate change. Where development in areas at risk of flooding is the only option following the application of the sequential test, it will only be permitted where all of the following criteria are met:

   a. the type of development is appropriate to the level of flood risk associated with its location in reference to Coventry's SFRA flood zone maps and advice on appropriate uses within these zones from the Environment Agency and Lead Local Flood Authority (LLFA);

   b. it is provided with the appropriate minimum standard of flood defence and resilience to aid recovery (including suitable warning and evacuation procedures) which can be maintained for the lifetime of the development;

c. it does not impede flood flows, does not increase the flood risk on site or elsewhere or result in a loss of floodplain storage capacity;

d. in the case of dwellings, it is evident that as a minimum, safe, dry pedestrian access would be available to land not at high risk, and;

e. in the case of essential infrastructure, access must be guaranteed and must be capable of remaining operational during all flooding events.

2. All opportunities to reduce flood risk in the surrounding area must be taken, including creating additional flood storage and exploring areas for natural flood management. In this instance, reference should be made to the Councils IDP. In order to achieve this:

a. the functional floodplain (Flood Zone 3b) should be protected from development and reinstated in brownfield areas wherever possible;

b. single storey buildings, basements and buildings on stilts will not be acceptable in Flood Zones 2 and 3;

c. all opportunities to undertake river restoration and enhancement including de-culverting, removing unnecessary structures and reinstating a natural, sinuous watercourse will be encouraged;

d. unless shown to be acceptable through exceptional circumstances, development should be set back at least 8m (from the top of bank or toe of a flood defence) of Main Rivers and 5m from Ordinary watercourses for maintenance access. This includes existing culverted watercourses.

e. finished floor levels must be set a minimum of 300mm above the pluvial 1% Annual Exceedance Probability (AEP) (1 in 100 year) plus climate change and 600mm above the fluvial 0.1% AEP (1 in 1000 year) plus climate change flood level.

3. Where a development benefits from existing or proposed flood measures, the development should contribute towards the capital and/or maintenance of these measures over the lifetime of the development.

4. For sites in Flood Zone 3a, development should not impede flow routes, reduce floodplain storage or consume flood storage in a ‘flood cell’ within a defended area. If the development does result in a loss of storage, compensatory floodplain storage should be provided on a ‘level for level’ and ‘volume for volume’ basis.

5. For sites in Flood Zone 3a, all types of new development behind flood defences should be avoided, where possible, due to the residual risks of breach and overtopping. Development should ensure that it would not prevent the Water bodies’ ability to reach good status or its potential to do so as set in the Severn River Basin Management Plans and should support, where possible, to improving the status class.

6. A sequential, risk-based approach to the location of suitable development will be undertaken by the Council based on flood maps, SFRA flood zones and Vulnerability Classification to steer new development to areas with the lowest probability of flooding avoiding, where possible, flood risk to people and property and managing any residual risk.

7. The Exception Test is applicable where there are areas in Flood Zones 2 and 3 where the Sequential Test alone cannot deliver acceptable sites but where some continuing development is necessary. The Exception Test will apply where development will provide wider sustainability benefits that outweigh flood risk, fully informed by an appropriately scaled Flood Risk Assessment (FRA) which indicates that the development will be safe for its lifetime, taking account of the vulnerability of its users without increasing flood risk elsewhere and where possible, reducing overall flood risk.

8. Land that is required for current and future flood management will be safeguarded from development. Where development lies adjacent to or benefits from an existing or future flood defence scheme, they may be expected to contribute towards the cost of delivery and/or maintenance of that scheme in accordance with Policy IM1.

9. A FRA is required, appropriate to the scale and nature of the development proposed, where the development is:

   a. within a river floodplain, as defined by the Coventry SFRA indicative flood zone maps;

   b. within 20 metres of any watercourse;

   c. adjacent to, or including, any flood bank or other flood control measure / structure;

   d. within an area where there may be surface water issues and drainage problems;

   e. within an area where there is flood risk from canals, reservoirs or flooding from sewers.

10. Where a development proposal lies adjacent to the existing de-culverted river Sherbourne, a natural sinuous river channel should be retained. Consideration should also be given to removing water bodies from culverts wherever possible and viable. This will be of particular importance along Fairfax Street and will be vital to create multi-functional green and blue spaces within the city centre.

11. All proposals will be expected to demonstrate, how, in areas at risk of flooding, the safety of those sleeping in any ground floor accommodation will be secured.

Sustainable Drainage

13.16 SuDS involve a range of techniques that mimic the way that rainfall drains in natural systems and avoids any increase in flood risk and improves water quality. Many existing drainage systems can cause problems of flooding, pollution or damage to the environment and are not proving to be sustainable in the long term. The key objectives in the use of SuDS are:

- reducing flood risk and mitigating the impacts of climate change;
- maintaining and restoring natural flow routes together with the rate and volume of surface runoff to reduce the risk of flooding;
- improving the water environment quality;
- minimising diffuse pollution;
- reducing pressure on the sewerage network;
- improving habitat, biodiversity and local amenity;
- harness opportunities to incorporate multi-functional uses such as green space play areas.

13.17 The Council is also the Lead Local Flood Authority (or LLFA for short) with responsibility for developing, maintaining and monitoring a Local Flood Risk Management Strategy in partnership with other relevant bodies in the area. In addition, the LLFA is a statutory consultee on all major planning applications and a consultee on a non-statutory basis on all minor applications whilst also advising on the approval of all sustainable drainage and related systems, surface flooding and ground water for all planning applications.

13.18 In respect of SuDS, it is important to emphasise the need for a management train where drainage techniques can be used in series to change the flow and quality characteristics of the runoff in stages. For a management train to work effectively the train must contain the right type of SuDS. The detail for this would be set out in the SPD, but all consideration should be given to the principle by ensuring developments implement source controls as part of the management train. In environmental terms this approach is good for water quality. With respect to future maintenance, it places the responsibility with the development owner and reduces or eliminates runoff from the small rainfall events which constitute the majority of rain events.

13.19 Separate guidance will detail how SuDS schemes will be designed, adopted and maintained in accordance with the technical standards set out by the Sustainable Drainage Systems Approval Bodies (SABs). As part of the Transport and Infrastructure Design Guide, a separate guide will indicate the National and Local technical standards for SuDS schemes.

Policy EM5 Sustainable Drainage Systems (SuDS)

1. Schedule 3 of the Flood and Water Management Act (FWMA) 2010* provides the framework by which all new developments are required to apply SuDS and should ensure that surface water runoff is managed as close to its source as possible. The FWMA gives SuDS Approval Bodies (SABs) statutory responsibility for approving and where appropriate, adopting, the approved SuDS features.
2. SuDS are the preferred way of managing and conveying surface water. All developments will consider and demonstrate how the following hierarchy for the discharge of surface water from a site will be applied:
   a. Discharge by infiltration, attenuation, water reuse technologies and green roof technology;
   b. Discharge to a watercourse allied with attenuation, water reuse technologies such as green roof technology;
   c. Discharge to surface water sewer allied with attenuation, water reuse technologies and green roof technology.
3. Where proven that infiltration allied with water reuse technologies is not possible, surface water should be discharged into a main river or ordinary watercourse (in agreement with the Environment Agency and the LLFA) at a rate no greater than Qbar greenfield runoff, or an appropriate minimum rate for small sites, agreed by the LLFA. If there is no watercourse available then, allied with water reuse technologies, surface water should be discharged to a surface water sewer at a rate no greater than Qbar greenfield runoff.
4. In exceptional circumstances where a sustainable drainage system cannot be provided, it must be demonstrated that it is not possible, and an acceptable alternative means of surface water disposal is provided which does not increase the risk of flooding or give rise to environmental problems and improves on the current situation with a reduction in peak and total discharge.
5. The developer must agree all long-term maintenance arrangements for all SuDS with the SAB, including the means for funding the maintenance for the lifetime of the development.

*Flood and Water Management Act (FWMA) 2010 or future equivalent.

Previously Developed Land

13.20 When promoting land affected or potentially affected by contamination developers and site promoters are actively encouraged to engage with the Environment Agency as early as possible in the planning process to follow the risk

management framework provided in Land Contamination Risk Management (LCRM) 2020. Furthermore, it is advised to refer to the Environment Agency's Guidance on Requirements for Land Contamination Reports (2005) for the specific type of information that we require to assess the risks to Controlled Waters. It is recommend that developers should:

- Follow the risk management framework provided in Land Contamination: Risk Management, when dealing with land affected by contamination
- Refer to the Environment Agency's Guiding principles for land contamination for the type of information that they require in order to assess risks to controlled waters from the site - the local authority can advise on risk to other receptors, such as human health
- Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land
- contamination risks are appropriately managed
- Refer to the contaminated land pages on: www.gov.uk/government/collections/land-contamination-technical-guidance

13.21 The Environment Agency require the risk to groundwater of any significant contamination to be considered by a desk study, site investigation and subsequent conceptual model and risk assessment, where necessary leading to suitable remedial action and related method statement. This is in accordance with the NPPF (Para 109 -112), which indicates that where development is proposed on land that is known or suspected to be affected by contamination then the risks to human health and the wider environment should be assessed by the applicant for consideration by the LPA prior to determination.

13.22 The assessment should provide such information as is necessary to determine whether the proposed development can proceed. Where such assessment shows that remediation is required then the standard of remediation that should be achieved through the grant of planning permission for new development is the removal of unacceptable risk and making the site suitable for its new use, including the removal of existing pollutant linkages. All receptors relevant to the site should be protected to an appropriate standard. As a minimum, after carrying out the development and commencement of its use, the land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990.

13.23 Development proposals will need to comply with the Environment Agency publication Groundwater Protection: Policy and Practice' (GP3) which may require development to be restricted at certain locations with a need to give careful consideration given to the potential water quality risks and impact on flooding and surface water drainage.

Policy EM6 Redevelopment of Previously Developed Land

1. Development will be supported where proposals do not have a negative impact on water quality, either directly through pollution of surface or groundwater or indirectly through the treatment of wastewater by whatever means.
2. Prior to any potential development, consultation should be held with Severn Trent Water Ltd to ensure that the required wastewater infrastructure is in place in sufficient time. In line with the objectives of the Water Environment Regulations, development must not affect the water bodies' ability to reach good status or its potential, as set in the Humber and Severn River Basin Management Plans and where possible should support improving the status class.
3. Developers and operators must provide adequate information when submitting their proposals so that the potential impact on groundwater resources and quality can be adequately assessed. This should include a risk assessment demonstrating there would be no adverse effect on water resources.
4. Development will not be permitted within a groundwater Source Protection Zone 1 which would physically disturb an aquifer. This will include situations where proposed wastewater infrastructure could pose an unacceptable risk of pollution of the underlying aquifer or receiving watercourse.
5. Development must meet a water efficiency target of 100l/pd using a fittings-based approach.
6. New build non-residential development greater than 1000sqm to achieve at least 4 credits in the Wat01 Measure for water in the Building Research Establishment Environmental Assessment Method (BREEAM) New Construction standard.

Air Quality

13.24 As previously highlighted in the Accessibility chapter of this Plan, the whole of Coventry is designated as an Air Quality Management Area and has been since 2009. Emissions from road transport are the major source of pollution in Coventry, with emissions from industry also contributing. It must be recognised that transport requirements associated with the construction phase itself has a negative impact upon air quality. Under Part IV of the Environment Act 1995, the Council carries out annual review and assessment of air quality in the city, within the context of national air quality standards and objectives.

13.25 As a partner of the Low Emissions Towns and Cities programme (LETCP), the Council is working together with its West Midlands neighbours to improve air quality and reduce emissions from road transport. This is alongside the emerging 'West Midlands Metropolitan Transport Emissions Framework' which sets out transports role in tackling air quality issues and has proposed a range of policies. The intention is to do this by promoting the uptake of low emission fuels and technologies, establishing and sharing best practice policies, and developing various tools and resources. The objectives of the programme are to investigate and produce various regional strategies designed to improve air quality, with a view to meeting national air quality objectives.

13.26 Funded through the DEFRA Air Quality Grant, the aims of the LETCP and West Midlands Transport Emissions Framework are to:

- Improve air quality through the reductions in road transport emissions, and simultaneously reductions in carbon emissions;
- Establish best practice policies and measures for the West Midlands, creating transferable models for other towns and cities;
- Improve health; and
- Maximise opportunities for economic development through the transition to a green economy.

13.27 To support the improvement in the city's air quality this policy should be applied in conjunction with the Low Emissions Strategy and Good Practice Guidance on Planning and Procurement for the West Midlands (2014) developed by the LETCP. All major developments will therefore be required to undertake full air quality assessments. Where appropriate exposure assessments will also apply to smaller developments in accordance with this guidance.

13.28 Exposure assessments will need to include an understanding of potential exposure to pollutants, as well as a proposal for mitigation measures such as:

- designing buildings to ensure local people are less exposed;
- green areas are incorporated into development to help create barriers to pollutants;
- that building layout and design prevents the creation of wind tunnels and canyons to help the dispersal of pollutants.
- This policy should be applied in conjunction with the Low Emissions Strategy and Good Practice Guidance on Planning and Procurement for the West Midlands.

13.29 Specific attention should be paid to location of sensitive developments, e.g. schools, hospitals, residential areas. Detailed methodology for full air quality and exposure assessments should however be agreed with the Council. Mitigation and compensation measures, ensuring that all developments are sustainable from an air quality perspective, should be submitted with all proposals. Where

appropriate, such measures may be secured through a legal agreement. Recommended measures for all types of developments can be found in the LETCP Air Quality Planning Guidance.

Policy EM7 Air Quality

1. Major development schemes should promote a shift to the use of sustainable low emission transport (electric vehicles and vehicles that use biofuels) to minimise the impact of vehicle emissions on air quality. Development should be located where it is accessible to support the use of public transport, walking and cycling. All major development proposals should be suitably planned to design out any adverse impact on air quality and be in accordance with the West Midlands Transport Emissions Framework and associated policies.
2. Major Development proposals will be required to demonstrate that they do not lead to a significant deterioration in local air quality resulting in unacceptable effects on human health, local amenity or the natural environment. The air quality assessment should address:
   a. The existing background levels of air quality;
   b. The cumulative background levels of air quality (related to the cumulative impact of developments in an area); and
   c. The feasibility of any measures of mitigation that would prevent the national air quality objectives being exceeded, or would reduce the extent of the air quality deterioration.
3. This policy will be applied in line with the Air Quality SPD.

Waste

13.30 The Council recognises the importance of sustainable waste management both locally and in cooperation with its neighbours to ensure that all the waste management needs of the area are met. The key challenges for future growth in waste will be balancing economic prosperity and associated growth with the financial strains of providing necessary infrastructure. Waste policy of the Local Plan is applied in accordance with the Council's Waste Strategy.

Policy EM8 Waste Management

1. The Council's Waste Management Strategy will be supported through:
   a. encouraging less consumption of raw materials through the reduction and re-use of waste products;

b. a requirement for development proposals to incorporate adequate storage for waste and recycling services along with safe access for collection vehicles;

c. encouragement of new methods of processing and recycling at waste management sites;

d. supporting recycling proposals for aggregate materials subject to the criteria in part 2 of this policy;

e. Existing waste management facilities or land allocated for waste management uses being protected from encroachment by incompatible land uses that are more sensitive to odour, noise, dust and pest impacts; and

f. Proposals for waste management facilities only being permitted where they would not have an unacceptable impact on the quantity or quality of surface or groundwater resources.

2. Proposed new or expanded waste management facilities will be assessed against the following criteria:

a. The effect of the proposed waste facility upon the environment and neighbouring land uses;

b. The impact of traffic generated by the proposal and the availability of alternative transit modes, such as rail and waterways;

c. The need for pollution control measures appropriate to the type of waste to be processed or handled;

d. The impact of proposals on residential amenity. New waste facilities will not normally be approved adjacent to existing housing and proposals for anaerobic digestion will not be approved in close proximity to existing housing;

e. The effect of proposals on aircraft safety; and

f. The design of the proposal. Careful consideration should be given to the need to minimise environmental and visual impact. Wherever feasible, waste operations should be enclosed within buildings or sealed structures in order to minimise impacts on adjacent uses from noise, ordure, vermin and wildlife. Proposals advocating open air unenclosed storage of organic odour producing material will not be supported.

3. Proposals will be supported where it is demonstrated that these criteria are satisfied.

4. Development proposals should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that

provide adequate space to facilitate waste storage, reuse, recycling and composting.

Minerals

13.31 The continued supply of aggregates and other material, including recycled and secondary materials is required to meet current and future needs of the development and construction industry. Promoting the use of recycled and secondary materials will help to minimise both primary extraction and waste and so is reflected in Policy EM8.

13.32 The National Planning Policy Framework requires local planning authorities to define Mineral Safeguarding Areas (MSAs) in Local Plans in order that proven mineral resources are not needlessly sterilised by non-mineral development, although there is no presumption that resources defined in MSAs will be worked.

13.33 MSAs are required to identify what are considered to be economic deposits of mineral. The purpose of MSAs is to ensure that mineral resources are adequately taken into account in all spatial planning decisions. They do not automatically preclude other forms of development taking place, but highlight the presence of economic minerals so that it is considered, and not unknowingly or needlessly sterilised.

13.34 In areas where extraction is permitted or is planned, Mineral Consultation Areas will be designated. None are proposed for Coventry during this plan period as there are no anticipated active mineral sites that are being brought forward during the plan period. This has been evidenced through the British Geological Society's Mineral Safeguarding Project, which has been undertaken for the Coventry, Solihull and Warwickshire authorities.

13.35 In Coventry, the predominant economic mineral resource is coal. MSAs for this mineral have been identified having had regard to advice in the 'Guide for Mineral Safeguarding in England' produced by the British Geological Society (BGS) in November 2007. The former coal mining site at Daw Mill (which lies outside Coventry's boundaries) previously had a direct impact on the extensive concealed coal reserves that extend across the southern coalfield. These areas lie in the north western areas of Coventry's administrative boundary. Following the closure of the site however, the mining of this area is now highly unlikely.

13.36 Local authorities are required to prepare a Local Aggregate Assessment (LAA) to assess the capacity and outputs from existing sources, and to assess future supply options. Work is undertaken collaboratively by the seven West Midlands Metropolitan Authorities in order to address cross boundary mineral planning issues. The Council will continue to proactively work with its neighbours through

joint working and collaborative efforts via the West Midlands Aggregate Working Party.

Policy EM9 Safeguarding Mineral Resources

Mineral Safeguarding Areas are defined for mineral reserves that are considered to be of current or future economic importance. Where developments are proposed in these areas, the application needs to acknowledge the presence of these mineral reserves. The extent of Mineral Safeguarding Areas are defined on the Policies Map.

13.37 In terms of non mineral development in Mineral Safeguarding Areas, the policy aims to take a balanced approach to protecting minerals resources in Coventry against the need to attract investment and urban regeneration to a primarily built up area.

13.38 This policy ensures that all proposals for non-mineral working within the designated MSAs are properly considered and evaluated in partnership with the Coal Authority. The Policy also aims to ensure that development proposals within the Plan are deliverable without complete sterilisation due primarily to the extensive deep cast coal reserves to the West and North West of the city. Within this location this has been further emphasised by the closure, and planned redevelopment of the Daw Mill Colliery, which would have provided the primary access point for the extraction of such reserves. Development identified within policies H2 and/or JE2 would not therefore be subject to this policy

Policy EM10 Non Mineral Development in Mineral Safeguarding Areas

All non-mineral development proposals in the designated Mineral Safeguarding Areas should assess and evaluate the legacy of past mining heritage and should consider this in accordance with Policy EM2. It should also ensure that development does not entirely sterilise any potential future mineral extraction should this become viable and desirable. This should be considered in partnership with the Coal Authority.

Energy Infrastructure

13.39 The ways in which heating and power are delivered to and used in development will need to change to meet the requirements of a zero-carbon future and the intended reduction of greenhouse gas emissions. The use of fossil fuels and traditional forms of energy generation will need to be phased out and replaced by zero-carbon, non-polluting and energy-efficient sources. These methods will

include the use of heat networks and communal heating systems, wherever possible.

13.40 Sections 1 – 4 of the policy should be addressed at design and post-completion stages, to ensure that the development has been built to intended standards. Post-completion resubmission of the original energy statement including energy performance calculations, informed by the relevant tests to systems and fabric, should be required as a condition as part of the planning application process. Compliance with sections 6 and 8 should also be demonstrated post-completion through planning condition.

13.41 Sections 1, 4 and 9 should also be demonstrated at planning application stage through the submission of an energy statement (and corresponding Viability Assessment if required), which should include associated output reports from energy modelling software (e.g. Standard Assessment Procedure (SAP), Building Research Establishment Domestic Energy Model (BREDEM), Passive House Planning Package (PHPP), or Home Energy Model (HEM) when available for general use).

Fabric efficiency

13.42 Applicants are expected to target reductions in the energy demand of buildings under section 1; a minimum 63% improvement is sought. Reducing the total energy demand of a building will reduce the overall provision of renewable energy required by section 4. The Council will expect applicants to deliver energy savings to the greatest extent possible before renewable energy provision is designed, or if offsetting is proposed.

13.43 In addition, where it is not feasible or viable to deliver the required renewable energy generation to meet section 4, the Council will expect applicants to reduce the energy demand of the building(s) to the greatest extent possible. This seeks to ensure that the building reduces its energy demand first and operational costs are minimised for occupiers.

Non-mandatory energy targets in section 2

13.44 Achievement of these energy efficiency performance levels will reduce the amount of solar PV required under section 4. This can save the applicant costs in renewable energy provision and / or energy offsetting.

13.45 Performance against these non-mandatory targets would need to be calculated using a method that accurately predicts energy use. SAP is not suitable for this due to its poor predictive accuracy. PHPP is a suitable methodology. The Council may subsequently take a view on whether the incoming HEM may be suitable when HEM's final form is known.

Steps to calculating and narrating amount of renewable energy provision

13.46 First, calculate the total predicted annual energy use in Kilowatt Hour (kWh) for all proposed new buildings (whole buildings, regulated and unregulated, after all the measures proposed in the application towards compliance with section 1). This can be modelled using SAP, BREDEM (the methodology on which SAP is based), or PHPP. PHPP is the preferred model due to its accuracy, to avoid SAP's inaccuracies at predicting actual energy use in operation (SAP underestimates space heat demand, overestimates unregulated energy, and may overestimate hot water use). The Council may later take a view on whether the incoming HEM is a suitable method for energy use prediction when the final form of HEM is available.

13.47 Second, calculate the annual renewable energy generation for whole site in accordance with the Microgeneration Certification Scheme (MCS) guidance for the relevant renewable energy technology (anticipated to be solar PV in most cases as this is typically the most suitable technology in an urban setting). This does not have to be exclusively on the buildings themselves and can include provision of new standalone renewable energy installations within the site. The figure does not include renewable heat delivered by heat pumps, as that would count instead towards section 1.

13.48 Third, deduct the annual renewable generation from the annual energy use. The result should be zero or less. If the result is not zero or less, explore how to provide more on-site renewable energy (for example through an adjustment to roof orientation, and ensuring PV area provision has been explored up to at least equivalent of 70% of projected building footprint including roof overhangs and with reasonably efficient panels available on the market).

13.49 If it proves unfeasible to increase renewable energy generation on-site to result in an annual balance of energy generation with energy use, then divide the total annual renewable energy generation by the building footprint. This result should be at least 114.9kWh. If this is impossible, provide evidence as to why this is not possible even with a PV area equivalent to 70% of projected building footprint and reasonably efficient panels available on the market.

13.50 Finally, calculate the residual energy demand (whole building, not per m2) for all proposed new buildings after all measures proposed in sections 1 and 4, then proceed to use this figure to calculate the required amount of offsetting provision in section 5.

Offsetting calculations

13.51 This is a one-off payment, where the annual shortfall in on-site renewable energy generation is multiplied by the energy offset price. Because the kWh energy use of the home and the kWh of energy generation that the offset fund will install are both annual figures, this amount does not need to be multiplied by a number of years.

13.52 The requirement for offsetting may be applied flexibly where it is demonstrated that this makes social and affordable housing unviable due to unique site circumstances that result in cost uplifts significantly higher than assessed in the Whole Plan Viability Assessment. As detailed previously, the flexibility could include a reduction in the scope of energy that has to be offset, or a reduced price per kWh if the Council is confident the scheme can still deliver the required amount of PV for that reduced price. The per-kWh price stated in the policy reflects an average of several recent years' per Kilowatt Peak (kWp) median cost for PV installations sized 4-50kWp (source: Department for Energy Security and Net Zero data), divided by a typical output (kWh per kWp) with Sandwell's annual average sunlight. The national data set gives costs for installations at three different sizes: 0-4kWp, 4-10kWp, or 10-50kWp. The larger-scale installations have a lower cost per kWp.

13.53 If the Council chooses to allow a lower offset price, a good guideline minimum would be no lower than the lowest price stated in the most recent available version of that national data set – unless the Council can deliver the PV at an even lower price (for example, via the Council's access to more affordable sites, local supply chains or combining the PV installation with other planned works). The degree of flexibility will depend on the unique scheme characteristics and evidence submitted the local authority about what could be viably accommodated.

Assured performance methods

13.54 These are processes to follow throughout design, construction, commissioning and building handover that reduce the energy performance gap (the gap between predicted energy use and actual energy use). These not only help keep the building's actual carbon emissions to a minimum (as opposed to their predicted emissions using inaccurate methods like SAP), but they also help to ensure occupant satisfaction. Suitable methods include Building Services Research and Information Association (BSRIA) Soft Landings119, NEF / GHA Assured Performance Process120, and Passivhaus certification. Other processes may be available or become available during the course of the plan. Alternative processes proposed by the applicant will be subject to consideration by the Council on their evidence-based merits. There are also some additional tools available that are not in themselves an assured performance process but

that can assist in improving the energy performance of a building in use, such as BS40101121.

Applicability to outline applications

13.55 Compliance with the policies will be conditioned at outline stage and must be confirmed in detailed reserved matters. However, the Council accepts that the degree of detail provided in the outline energy strategy will be less than that for full and reserved matters applications. It is also recognised that this means the outline energy calculations may be largely based on assumptions. The aim should be to demonstrate that options have been identified by which the development could comply with the policy targets, considering the broad mix of anticipated floorspace, typologies and site conditions. Statements made about estimated carbon and energy performance based on a high degree of assumptions at outline stage should be reassessed at detailed reserved matters, albeit the reserved matters may diverge in how the required compliant performance will be achieved.

13.56 Where more detail is known, it should be reflected in the outline application; for example, if development is expecting to connect to a site-specific low-carbon energy source. As a further illustration, if a limited number of repeated home types are expected on a site, the energy modelling would ideally reflect similar house types and identify a specification by which they could meet the policy targets for energy efficiency and renewable energy (taking into account site conditions). The modelled homes could reflect, for example, a sample of the intended housebuilder's house types that are most likely to be built on the site. This exercise benefits the developer in that it gives an early understanding of the degree of amendment needed to their existing regular specifications. This will then allow them to set up supply chains and benefit from economies of scale in advance of commencing on site; outline proposals typically relate to large-scale developments that can take several years to reach commencement.

13.57 The estimated offsetting contribution (if required) for an outline application should be stated in the outline Energy Assessment. These will be subject to a Section 106 agreement, but not paid at the time of the outline application. In that case the offset contribution must be recalculated within the subsequent reserved matters application and paid prior to occupation.

Post-occupancy energy monitoring

13.58 The purpose of this element is to reveal the real energy performance of buildings compared to the energy use predicted using Building Regulations calculations. This is not intended as a policing or enforcement mechanism but as means of gathering data for both developers and the Council, to inform both future development and construction work and ongoing policy development. This data will help enable the development of local performance benchmarks.

There is often a significant difference between Building Regulations energy use predictions and reality, because there is currently no nationwide feedback mechanism on actual energy performance for those who consented, designed or built the homes. This is an issue which will need to be improved in order to meet the UK's carbon targets; this policy is intended to contribute to that learning process. Similar policies have been successfully implemented elsewhere for several years.

13.59 At design stage (and therefore planning application stage), it will be important to put metering arrangements in place to enable this data collection, with as little disturbance to occupants as possible (e.g. ideally automated meters and /or meters located in an area accessible by the reporter without entering individual homes or units). Residential data should be aggregated to a level that enables anonymisation before reporting (other locations' similar policies suggest a minimum of 5 homes' data should be aggregated together before reporting). For residential data collection, households' consent should be acquired.

13.60 The use of Heat pumps will be considered as a energy efficiency measure rather than a renewable energy measure. As a measure in aid of this Target Emissions Rate (TER) target, achieve an improvement (reduction) on Part L 2021 Target Fabric Energy Efficiency (TFEE) as follows:

- End terrace: ≥12%
- Mid terrace: ≥16%
- Semi detached with room in roof: ≥15%
- Detached: ≥17%
- Bungalow: ≥9%
- Flats / apartments: ≥24% (weighted average, whole block).

Policy EM11 Energy Infrastructure

All new build dwellings (use class C3 and C4) are required to submit an energy statement demonstrating that the development meets the requirements set out in section 1.

1. Building Efficiency Part L % improvement:
    a. ≥63% improvement (reduction) on Part L 2021 TER, from energy efficiency measures.
    b. Heat pumps are to be calculated as an energy efficiency measure, rather than a renewable energy measure.

All the above should be calculated using SAP10.2 or an updated version (or the Home Energy Model, HEM, once it is implemented).

2. Alternative Compliance

a. Positive weight will be given to applicants who can demonstrate the following absolute energy metrics:

i. Total Energy Use: 35 kWh/m2/year
ii. Space heating demand: 15 kWh/m2/year

Performance in these targets must be evidenced using a methodology that accurately predicts buildings' operational energy use. Suitable methodologies include PHPP. Where a building achieves Passivhaus certification, it will be deemed to have complied with these targets.

b. Where this section is demonstrated to have been achieved, it will be assumed that Policy EM11 section 1 is also achieved, as the section 2 targets reflect an improved and preferable standard that more robustly reflects actual energy performance based on energy metrics guidelines.

3. Clean energy supply

a. The use of fossil fuels and connection to the gas grid will not be considered acceptable.

In addition to the requirements in sections 1 and 2, positive weight will be given to applicants who can demonstrate the following requirements:

b. Major developments (residential development of ten or more dwellings) should include an assessment of decentralised energy networks within the Energy Statement.
c. This assessment should outline existing or planned decentralised energy networks in the vicinity of the development and should assess the opportunity to connect to them.
d. Where there is an existing or imminently planned network, the general expectation to pursue a connection may be waived if it can be demonstrated that the development is not suitable, feasible or viable for district heat or decentralised energy networks, or that an individualised solution would result in lower overall carbon emissions than connecting to the decentralised network, taking into account that network's carbon emissions factors.
e. For developments of over 10+ dwellings, applicants are expected to identify and address:
   i. Current or proposed major heat supply plants, or networks (for example, industrial uses, data centres)
   ii. Possible opportunities to utilise energy from waste, or waste heat from an industrial process
   iii. Opportunities for private wire electricity supply from renewable sources
   iv. Utilisation of natural and engineered heating or cooling systems.

4. On-site renewable energy:

Where viable, all major development should seek to deliver the following on site renewable energy generation standards.

a. On-site annual renewable energy generation capacity (in kWh) at least equal to the predicted annual total regulated and unregulated energy use (residual energy use in kWh after section 1 has been achieved, plus unregulated energy use).

b. Where an on-site net zero regulated and unregulated energy balance is not possible or viable[5], it should be demonstrated that the amount of on-site renewable energy generation equates to >114.9 kWh/m2projected building footprint/year.

c. Where a building in a multi-building development cannot individually achieve the requirements in a. and b above, this shortfall is to be made up across other units onsite before carbon offsetting (section 5) is considered.

d. Large-scale development (50 residential units or more) should demonstrate that opportunities for on-site renewable energy infrastructure (on-site but not on or attached to individual dwellings), such as solar PV canopies on car parks, have been explored.

e. Regulated and unregulated energy use can both be calculated with Part L SAP or BREDEM, but a more accurate method such as PHPP is advised. Any other proposed methods are subject to Council confirmation of acceptability.

f. The annual renewable energy generation and the annual energy use are whole-building figures, not per-m2 figures.

g. Renewable energy output should be calculated in line with MCS guidance for the relevant technology (expected to be PV in most cases).

5. Energy offsetting:

a. Only in exceptional circumstances and as a last resort where it is demonstrably unfeasible to achieve an on-site net zero regulated and unregulated energy balance, any shortfall in on-site renewable energy generation that does not match energy use is to be offset via S106 financial contribution, reflecting the cost of the solar PV that will need to be delivered off-site.

b. The energy offset price will be based on cost of solar PV data from the Department for Energy Security and Net Zero. The price should be revised annually. This is set as a one-off payment, where the annual shortfall in on-site renewable energy generation is multiplied by the energy offset price. This amount does not need to be multiplied by any number of years.

6. Reduced performance gap:

[5] Exceptional circumstances where an on-site net zero energy balance is not achieved may only be found acceptable in some cases, for example with taller flatted buildings (4 storeys or above) or where overshadowing significantly impacts solar PV output

When enacting section 4, developments will need to consider the following requirement:

a. An assured performance method must be implemented throughout all phases of construction to ensure operational energy in practice performs to predicted levels at the design stage.

7. Smart energy systems:

When enacting section 4, developments will need to consider the following requirements:

a. Proposals should demonstrate how they have considered the difference (in scale and time) of renewable energy generation and the on-site energy demand, with a view to maximising on-site consumption of energy generated on site and minimising the need for wider grid infrastructure reinforcement.

b. Where the on-site renewable energy generation peak is not expected to coincide with sufficient regulated energy demand, resulting in a need to export or waste significant amounts of energy, proposals should demonstrate how they have explored scope for energy storage and/or smart distribution systems. The purpose being to optimise on-site or local consumption of the renewable energy (or waste energy) that is generated by the site. Where appropriate, proposals should demonstrate that they have integrated these to optimise these carbon- and energy-saving benefits and minimise the need for grid reinforcements.

c. This may include smart local grids, energy sharing, energy storage and demand-side response, and/or solutions that combine elements of the above.

8. Post-occupancy evaluation:

a. Large-scale development (50 units or more) should monitor and report total energy use and/or renewable energy generation values on an annual basis. An outline plan for the implementation of this should be submitted with the planning application. The monitored in-use data are to be reported to the local planning authority for 5 years upon occupation.

Reducing operational carbon in new build non-residential development

13.61 Sections 1 - 4 of Policy EM12 must be addressed at design and post-completion stages, to ensure that the development has been built to intended standards. Post-completion resubmission of the original energy statement including energy performance calculations, informed by the relevant tests to systems and fabric, should be required as a condition as part of the planning application process. Compliance with sections 6 and 8 should also be demonstrated post-

completion through planning condition. Sections 1 - 5 should be demonstrated at planning application stage through the submission of an energy statement, alongside associated output reports from energy modelling software (e.g. Simplified Building Energy Model (SBEM)).

Compliance with section 1 target emission rates (TER) reductions

13.62 TER reduction targets are not limited to delivery solely through energy efficiency measures. There could be an element of clean energy supply or renewable energy measures included in them. However, further renewable energy will be needed to subsequently meet the requirement of section 4; applicants are advised to pursue energy efficiency measures as far as feasible in the first instance in pursuit of section 1, so that section 4 renewable energy requirements (to match 39% of regulated energy use) are not rendered excessively expensive or unfeasible. Designing to use less energy in the first place reduces the amount of renewable energy needed to match this, and / or the amount of carbon offset payment needed. The Council therefore expects applicants to demonstrate that energy efficiency has been maximised to the greatest extent feasible and viable, before renewable energy generation and / or offsetting is provided.

13.63 Applicants should be aware that in the current Part L for non-domestic buildings, the type of heating system in the 'notional' building (from which the TER is derived) is the same as the type of heating system in the actual proposed building. Therefore, no TER improvements will be made simply by switching from a gas or oil boiler to a heat pump or other all-electric or otherwise low-carbon heat system. However, Part L does define an assumed efficiency rate for each heating system type. Therefore, TER improvements can be made through selecting a heating system that is more efficient than Part L 2021's notional efficiency for that heating type.

On-site renewable energy target

13.64 As with the residential approach, first calculate the total predicted annual energy use in kWh for all proposed new buildings (whole buildings, regulated and unregulated, after all the measures proposed in the application towards compliance with section 1). This can be modelled using SAP, BREDEM (the methodology on which SAP is based), or PHPP. PHPP is the preferred model due to its accuracy, to avoid SAP's inaccuracies at predicting actual energy use in operation (SAP underestimates space heat demand, overestimates unregulated energy, and may overestimate hot water use). The Council may later take a view on whether the incoming HEM is a suitable method for energy use prediction when the final form of HEM is available.

13.65 Second, calculate the annual renewable energy generation for whole site in accordance with the MCS guidance for the relevant renewable energy

technology (anticipated to be solar PV in most cases as this is typically the most suitable technology in an urban setting). This does not have to be exclusively on the buildings themselves and can include provision of new standalone renewable energy installations within the site. The figure does not include renewable heat delivered by heat pumps, as that would count instead towards section 1.

13.66 Third, deduct the annual renewable generation from the annual energy use. The result should be zero or less. If the result is not zero or less, explore how to provide more on-site renewable energy (for example through an adjustment to roof orientation, and ensuring PV area provision has been explored up to at least equivalent of 70% of projected building footprint including roof overhangs and with reasonably efficient panels available on the market).

13.67 If it proves unfeasible to increase renewable energy generation on-site to result in an annual balance of energy generation with energy use, then divide the total annual renewable energy generation by the building footprint. This result should be at least 114.9kWh. If this is impossible, provide evidence as to why this is not possible even with a PV area equivalent to 70% of projected building footprint and reasonably efficient panels available on the market.

13.68 Finally, calculate the residual energy demand (whole building, not per m2) for all proposed new buildings after all measures proposed in sections 1 and 4, then proceed to use this figure to calculate the required amount of offsetting provision in section 5.

Assured Performance Processes for energy performance

13.69 Regarding assured performance processes, in addition to those mentioned in SCC1 (paragraph 4.23), there is also one additional method for non-residential development: National Australian Built Environment Rating System (NABERS) UK129 (administered by Chartered Institution of Building Service Engineers (CIBSE)). NABERS is currently only available for offices but is likely to extend to other building types in future.

Offsetting

13.70 The requirement for offsetting may be applied flexibly where it is demonstrated that this makes otherwise desirable development unviable due to the unique energy use profile of the proposed building and site characteristics. The flexibility could include a reduction in the scope of energy that has to be offset, or a discounted price per kWh if the Council is confident this can still deliver the required offset projects within this price (when pooled into the offsetting fund, which will primarily consist of full price offset contributions). The justification for Policy SCC1 includes further information on the available national guidance on

cost of solar PV, which achieve economies of scale with greater amounts of PV installation. The degree of flexibility available will depend on the unique scheme characteristics and evidence submitted to the Council about what can be viably accommodated. It may also depend on the degree to which the proposed development represents a socially desirable facility that meets unmet community needs (such as for healthcare, education, or similar).

Please see also the supporting text for Policy EM11 regarding:

a. calculating renewable energy provision and offset payments,
b. applicability to outline applications, and
c. assured performance processes.

Policy EM12 Reducing operational carbon in new build non-residential development

All new build non-domestic development over 1,000sqm of non-residential floorspace including C1, C2 and C2a and C5 are required to submit an energy statement demonstrating that the development meets the following requirements:

1. Building Efficiency Part L % improvement
    a. % improvement on Part L 2021 TER (or equivalent reduction on future Part L updates), through on-site measures as follows:
        - Offices: ≥25%
        - Schools: ≥35%
        - Industrial buildings: ≥45%
        - Hotels (C2, C5) and residential institutions (C2, C2a): ≥10%
        - Other non-residential buildings: ≥35%
2. Energy metrics guidelines
    a. Positive weight will be given to applicants who can demonstrate the following absolute energy metrics:
        - Total Energy Use: 65 kWh/m2/year
        - Space heating demand: 15 kWh/m2/year.
    b. Employing absolute energy metrics reduces the amount of solar PV required under policy element 3 below for an on-site net zero balance of regulated energy. Applicable methodologies to calculate this include CIBSETM54 and the Passivhaus Planning Package. At present, the Part L calculation method (SBEM) is not considered suitable as it is does not provide accurate predictions of a building's actual energy use.
    c. must achieve at least 4 credits in the Wat01 Measure for water in the BREEAM New Construction standard.

3. Clean energy supply

a. The use of fossil fuels and connection to the gas grid will not be considered acceptable.

b. Major non-residential developments (over 1,000sqm of non-residential floorspace including C1, C2 and C2a and C5) should include an assessment of decentralised energy networks within the Energy Statement.

c. This assessment should outline existing or planned decentralised energy networks in the vicinity of the development and should assess the opportunity to connect to them unless it can be demonstrated that the development is not suitable, feasible or viable for district heat or decentralised energy networks.

d. For developments over 10,000sqm of non-residential floorspace, applicants are expected to identify and address:

i. Current or proposed major heat supply plants, or networks (for example, industrial uses, data centres)

ii. Possible opportunities to utilise energy from waste, or waste heat from an industrial process

iii. Opportunities for private wire electricity supply from renewable sources

iv. Utilisation of natural and engineered heating or cooling systems.

4. On-site renewable energy

Where viable, all major development should seek to deliver the following on site renewable energy generation standards.

a. On-site annual renewable energy generation capacity to at least equal predicted annual total regulated energy use (residual energy use after policy element 1 has been achieved).

b. In buildings subject to Part L's requirement for energy forecasting, that forecasting should be the source of the 'annual total regulated energy' figure. Where an on-site net zero regulated energy balance is not possible or viable[6], it should be demonstrated that the amount of on-site renewable energy generation equates to >114.9 kWh/m2projected building footprint/year. Where a building in a multi-building development cannot individually achieve the requirements of Policy EM11 (3), this shortfall is to be made up across other units on-site before carbon offsetting (Policy EM11 (5) is considered.

c. Large-scale development (5000 m2 floorspace) should demonstrate that opportunities for on-site renewable energy infrastructure (on-site but not on or attached to individual dwellings), such as solar PV canopies on car parks have been explored.

[6] Exceptional circumstances where an on-site net zero energy balance is not achieved may only be found acceptable in some cases, for example with taller flatted buildings (4 storeys or above) or where overshadowing significantly impacts solar PV output.

5. Energy offsetting

    a. Only in exceptional circumstances and as a last resort where it is demonstrably unfeasible to achieve an on-site net zero regulated energy balance, any shortfall in on-site renewable energy generation that does not match regulated energy use is to be offset via S106 financial contribution, reflecting the cost of the solar PV delivered offsite.

    b. The energy offset price will be based on cost of solar PV data from the Department for Energy Security and Net Zero. The price should be revised annually. This is set as a one-off payment, where the annual shortfall in on-site renewable energy generation is multiplied by the energy offset price.

This is set as a one-off payment, where the shortfall in annual on-site renewable energy generation is multiplied by the energy offset price.

6. Reduced performance gap

    a. An assured performance method must be implemented throughout all phases of construction to ensure operational energy in practice performs to predicted levels at the design stage.

7. Smart energy systems

    a. Proposals should demonstrate how they have considered the difference (in scale and time) of renewable energy generation and the on-site energy demand, with a view to maximising on-site consumption of energy generated on site and minimising the need for wider grid infrastructure reinforcement.

    b. Where the on-site renewable energy generation peak is not expected to coincide with peak onsite energy demand, resulting in a need to export or waste significant amounts of energy, proposals should demonstrate how they have explored scope for energy storage and/or smart distribution systems. The goal is to optimise on-site or local consumption of the renewable energy (or waste energy) that is generated by the site. Where appropriate, proposals should demonstrate that they have integrated these to optimise carbon- and energy-saving benefits and minimise the need for grid reinforcements.

8. Post-occupancy evaluation

    a. Large-scale development (over 5000 m2 floorspace) should monitor and report total energy use and renewable energy generation values on an annual basis. An outline plan for the implementation of this should be submitted with the planning application. The monitored in-use data are to be reported to the local planning authority for 5 years upon occupation.

Overheating in new buildings

13.71 Compliance with sections 1 and 2 of the policy should be demonstrated within an energy statement at planning application stage, with supporting output reports from CIBSE assessments.

13.72 Although mechanical ventilation is listed down the cooling hierarchy as part of section 1, the use of mechanical ventilation with heat recovery (MVHR) should not be viewed negatively as this may assist compliance with operational energy policies. However, MVHR should have the ability to bypass the heat recovery function in periods of warmer weather in order to support the overheating risk mitigation goal.

13.73 Overheating assessments are a requirement of Building Regulations Part O (for residential), and is a common measure performed in the design of good-quality non-residential new buildings especially where a BREEAM rating is sought. Therefore, it should not inflict any significant additional burden on the development industry to deliver these policy requirements.

Policy EM13: Overheating in new buildings

All new build residential and non-residential buildings must meet the following requirements:

1. Cooling hierarchy:
    a. Demonstrate that overheating risk measures have been incorporated in accordance with the cooling hierarchy:
        i. Minimise internal heat generation through energy efficient design.
        ii. Reduce the amount of heat entering the building in summer using:
            - Building orientation;
            - Shading;
            - Albedo;
            - Fenestration; and
            - Insulation.
        iii. Manage heat within the building through exposed internal thermal mass and high ceilings.
        iv. Passive ventilation.
        v. Mechanical ventilation.
        vi. Active cooling measures.
2. Overheating Assessment

a. Residential development should complete CIBSE TM59 overheating assessment as their route to compliance with Building Regulations Part O. The simplified Part O route will not be considered acceptable. Non-residential development should complete CIBSE TM52 overheating assessment.

Embodied carbon and waste

13.74 Compliance with sections 1, 2 and 3 of the policy are to be demonstrated within an energy statement. If applicable, output reports for section 4 should be submitted alongside an energy statement. For section 5, it is accepted that the level of detail will be lower the smaller the development proposal.

13.75 The aim is to ensure applicants explore the topic of embodied carbon, but without setting requirements that are impractical or excessively costly at small sites. Points of narrative encouraged in the fulfilment of section 5 could include, but are not limited to:

- Reuse of existing features and materials on site, where present
- Design for material efficiency (reducing the amount of material needed) such as through structural design or use of space and layouts to avoid unnecessary material use.
- Substitution of low-embodied-carbon materials (such as timber) in place of higher-carbon materials (such as steel, aluminium, and unadulterated Portland cement)
- Material sourcing for reduced 'product miles' or from manufacturers with low-carbon manufacturing credentials
- Construction processes that reduce the typical rates of material wastage.

13.76 Proposals for new development of 1 or more homes or ≥100m2 non-domestic floor space, but below the size thresholds for embodied carbon reporting and targets as noted above, are encouraged to include a general narrative on the options that have been considered to minimise embodied carbon of the proposed development.

Policy EM14 Embodied carbon and waste

Residential and non-residential buildings (thresholds given below) must meet the following requirement:

1. Embodied carbon reporting

a. All major new residential (10 dwellings or more) and non-residential (1000 m2 floorspace or more) developments are required to complete a whole-life

carbon assessment in accordance with Royal Institute of Chartered Surveyors (RICS) Whole Life Carbon Assessment guidance.

2. Limiting embodied carbon
   a. All large-scale major development (50 dwellings or more; 5000 m2 non-residential floor space or more) is required to limit embodied carbon (RICS/BS 15978 modules A1 – A5) to 600 kgCO2e/m2 GIA.
3. Building end-of-life
   a. All new buildings are to be designed to enable easy material re-use and disassembly, subsequently reducing the need for end-of-life demolition.
4. Demolition audits
   a. All major development that contains existing buildings/structures to carry out a pre-redevelopment and/or pre-demolition audit, following a well-established industry best practice method (e.g. Building Research Establishment (BRE)).

Noise

13.77 As with other types of pollution, noise pollution has the potential to impact adversely on environmental amenity and biodiversity. Particularly significant, however, are its impacts, both direct and indirect, on health and wellbeing, for instance through loss of sleep or other negative health externalities such as stress that can be caused by exposure to sustained noise over a longer term. This policy seek to address and mitigate these impacts.

13.78 In terms of noise mitigation in assessing such schemes for either a noise-generating or noise sensitive development, account should be taken of:

- The location, design and layout of the proposed development
- Land levels and existing topographical features
- Existing levels of background noise;
- Hours of operation and servicing (where relevant);
- Potential for cumulative impact with nearby noise-generating uses;
- Measures to reduce noise within the development to acceptable levels, including external areas where possible; and
- The need to maintain adequate levels of natural light and natural ventilation to habitable areas of the development.
- The need to ensure that where ventilation is required in areas of poor air quality, measures do not impact the amenity of end users where open windows may be inappropriate.
- The need to ensure mitigation schemes can be satisfactorily verified and adequately maintained for the life of the development.

Policy EM15 Noise

1. Development which could result in an unacceptable impact on amenity, biodiversity or the surrounding environment by reason of noise pollution and / or increased levels of general disturbance will only be permitted if a noise assessment and associated scheme of mitigation (if necessary) demonstrates that noise and / or general disturbance can be adequately controlled through design, planning conditions or other means of mitigation.
2. Proposals for uses which are sensitive to noise will not be permitted close to existing or proposed potentially noise polluting uses unless it can be demonstrated that adequate mitigation measures can be provided to ensure adequate levels of amenity can be provided for future occupiers and the existing potentially noise polluting uses will not be prejudiced by the development proposed.
3. Development will not be permitted if mitigation cannot be provided to an appropriate standard with an acceptable design.

14. Coventry City Centre

Key evidence

Area Action Plan Background Paper 2024

One Coventry Plan 2022

Coventry City Council Climate Change Strategy

Context

14.1 Coventry City Centre was the focus of the City Centre Area Action Plan which was adopted in 2017 alongside the Local Plan. As part of the review, it was assessed which parts of the AAP were out of date, which parts duplicated core Local Plan policies, and which were up to date and would add local detail. This chapter therefore sets out locally specific policy for the city centre. Further information about the review of the AAP is set out in the City Centre Area Action Plan Background Paper.

14.2 The city centre boundary is defined within Appendix 9(d), alongside a 'transitional area' surrounding the centre. This transitional area, outside of the defined city centre is acknowledged to be informed by both the contexts of the City Centre and those areas beyond. Any development within this area should therefore make reference to both policy contexts, whilst density guidance (policy H9) and parking standards (Appendix 6) also reference the identified transitional area to the City Centre Boundary.

City Centre Development Strategy

14.3 The overall aims of the development strategy (Part A) accord with the key aims visions and objectives of Coventry City Council.

Policy CC1 (Part A) **Coventry City Centre – Development Strategy**

The city centre will continue to be developed and regenerated to ensure it is a truly world class city centre, leading in design, sustainability and culture.

This will be achieved by:

- Enhancement of its position as a focus for the entire sub- region and as a national and international destination to live, work and play;
- Enhancement of its retail and leisure offer to strengthen the city's sub-regional role;
- Provision of high quality office space;

- Becoming a hub for education;
- Including a variety of places to live which cater for different needs;
- Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment;
- A connected public realm including public squares and green spaces, easily accessible through the creation of desirable and legible pedestrian routes;
- Accessibility for all;
- Providing an attractive and safe environment for pedestrians, cyclists and motorists;
- Provide a high-quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure;
- Being a gigabyte city that offers high speed Wi-Fi and broadband facilities throughout the city centre;
- High quality sustainable built design;
- Continuing to develop a vibrant and attractive night time economy;
- Providing opportunities to improve health and wellbeing;
- Continuing to support greater integration of the university within the wider city centre
- Respecting key views to the iconic three spires of St. Michaels, Holy Trinity and Christchurch in line with the Tall Buildings Design Guide and View Management Framework SPD
- Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for deculverting wherever possible; and;
- Contributing to the key aims, vision and objectives of Coventry City Council.

City Centre Green and Blue Infrastructure

14.4 Part B sets out the Councils expectations around considerations of Green and Blue infrastructure within the city centre. Similar to many urban centres, the availability of such environments within the urban core can become constrained and as such the policy is seen to remain a necessary policy objective in the delivery of a high quality and resilient City Centre. The necessity for the policy

is also seen to be further reinforced with the anticipated growth of residential living in the city centre.

14.5 The policy addresses a number of environmental issues which are specific to the City Centre and therefore justify a standalone policy, including the considerations of development adjacent to the central ring road.

Policy CC1 (Part B) **– Green and Blue Infrastructure**

a. New development will be expected to maintain the quantity, quality and functionality of existing green and blue infrastructure. In line with the city's Green Space Strategy and Local Flood Risk Management Strategy, development proposals should enhance blue and green infrastructure, and create and improve linkages between the areas. Any development which is likely to adversely affect the integrity of a blue or green corridor will be required to be robustly justified and where appropriate, mitigation measures put in place. Development shall support meeting the objectives of the Severn River Basin Management Plan through ensuring that no deterioration of the River Sherbourne or its tributaries shall occur that may result in it failing its objectives under the Water Framework Directive.

b. Development adjacent to the Ring Road should maximise all opportunities to develop the greening of vertical surfaces as far as reasonably possible. Opportunities to add greenery to areas adjacent to the Ring Road will be encouraged.

c. Trees that contribute towards public amenity shall be retained and protected unless they are of poor quality, have a short life expectancy (less than 10 years), are dangerous, or the benefits of removing the tree significantly outweighs the harm that would be caused by its removal. Where trees are lost, replacement planting must be provided to a commensurate value to that which is lost.

d. Introduction of new, accessible green spaces in the City Centre will be encouraged. Proposals which positively contribute toward the open space objectives of Coventry City Council will be encouraged.

City Centre Drainage and Flood Risk

14.6 Part C relates to Drainage and Flood Risk. The core of the City of Coventry is located along the route of the River Sherbourne, this route being largely culverted and unavailable for access and viewing. The Council maintains an aspiration to make this watercourse available for view to capitalise upon the opportunity for environmental quality enhancements. Consideration of drainage and flood risk issues are key throughout the administrative area: the policy reinforces this important consideration alongside the aspirations of de-

culverting the river Sherbourne and acknowledging the that the increased levels of impermeability found in Urban Centres reinforce this important consideration and is to be read in conjunction with Policy EM4.

Policy CC1 (Part C) **Drainage & Flood Risk**

a. Development shall be designed in line with the requirements of policy EM4 and located to minimise the risk of flooding and if permitted development, be resilient to flooding. The opportunity must be exercised to maximise the absorption of surface water run-off by the ground. Sustainable Drainage methods shall be incorporated into new developments including treatment for water quality. Such provisions should consider opportunities to reflect the alignment of the River Sherbourne and/or its tributaries.

b. When development occurs, a Flood Risk Assessment will need to be produced to appropriately consider the risk of flooding from all sources.

c. When development occurs, it must consider the evidence in the Local Flood Risk Management Strategy, Surface Water Management Plan and Strategic Flood Risk Assessment. This includes all sites being treated as a Greenfield site when calculating permissible discharge rates in line with Policy EM5 of the Local Plan.

d. When development is proposed it should utilise water use reduction systems such as grey water harvesting to reduce the water usage within the proposed developments.

e. Where a development proposal lies adjacent to the existing de-culverted river Sherbourne, a natural sinuous river channel should be retained. Consideration should also be given to removing water bodies from culverts wherever possible and viable. This will be of particular importance along Fairfax Street and will be vital to create multi-functional green and blue spaces within the city centre.

City Centre Environmental management

Part D. Environmental management policies are a key consideration in the creation of high quality environments, and may be considered of heightened importance within urban areas where higher density development takes place and close proximity interfaces between uses. In line with this it is assessed that policy this policy ensures such considerations are carefully considered in development proposals in the City Centre. In line with the integration of City Centre policies into the core local plan, minor referential wording updates are proposed to ensure that the policy is read across other relevant policy areas within the local plan

Policy CC1 (Part D) **– Environmental Management**

New development must be designed to minimise environmental impact within the city centre and ensure that any impacts of pollution are appropriately considered and mitigated. In doing so new development schemes (including conversions and changes of use where appropriate) must ensure that:

a. All construction and demolition schemes adhere to a construction environmental management plan which must be submitted to and approved by the council before works commences. The CEMP must specify how the developer will mitigate noise and dust emissions from the works.

b. All opportunities to connect to heat line or implement renewable energy generation have been explored and included as part of new development unless shown to be unviable or inappropriate.

c. Ground contamination needs have been assessed and remediated using the Environment Agency Model Procedures for the Management of Land Contamination.

d. Proposals for site investigation and remediation schemes (where appropriate) utilise appropriate risk assessment and are approved by the Council in advance of development. Such measures should ensure that sites are 'fit for purpose'.

e. New residential and commercial development schemes and the introduction of fixed plant machinery have been designed to meet internal and external noise levels specified in BS4142 and BS8223, or subsequent replacement standards.

f. Appropriate odour extraction systems are incorporated where the sale / preparation / consumption of food takes place within the relevant buildings. Appropriate consideration has been given to the West Midlands LETC Air Quality guidance (or replacement guidance) and necessary mitigation measures incorporated into schemes.

g. Have regard to all other relevant polices within the Local Plan.

City Centre Character areas

Part E relates to a series of City Centre Areas which are distinct in terms of their character, both in terms of reflecting the current situation, and in terms of changes changes to character which will continue to take place during the forward plan period such as the recently consented City Centre South regeneration scheme. The character areas have been defined to reflect forthcoming expected change in the City

Centre. Additionally the nature of uses in the City Centre has undergone significant evolution in the last plan period as the economics of City Centres continues to evolve on a national level, therefore the character areas reflect their existing and foreseeable urban character. The Character Areas are mapped in Appendix 9(f).

This policy should also be read in conjunction with Density Policy H9 in that an area of higher density urban character is seen to existing in the periphery to the defined City Centre. The plan, read as a whole, proposes to be responsive to this character by incorporating elements of city centre policy into core plan policy. A transitional area is therefore identified beyond the defined City Centre boundary, acknowledging this periphery character area.

Whilst City Centre policies remain applicable within the defined City Centre boundary, development proposals within the transition zone should seek to acknowledge this 'transitional area' and consider how planned development may positively interface with the adjacent character areas within the defined City Centre

Policy CC1 (Part E) **– City Centre Character Areas**

- All Development within the City Centre should reference the individual character area of its location and deliver high quality, contextually responsive proposals.
- All development proposals within, or with the setting of, Conservation Areas will only be considered acceptable if they demonstrate that they preserve and enhance the historic environment of the area and are in adherence with the policies of the respective Conservation Area Appraisals and Management Plans.

The Friargate Area

a. Development within this area should deliver high quality office and residential development, alongside a mix of uses within its highly sustainable location. Uses considered to be acceptable include:

- Office Development
- High quality City Centre Residential Dwellings
- Leisure and recreation uses, including hotels;
- Social and community uses;
- Provisions for public transport infrastructure.

b. Improvements to and expansion of the Coventry Railway Station will be supported so long as it does not negatively affect heritage assets.

Cathedral and Cultural Area

a. Development in areas adjoining Conservation Areas should enhance their setting and improve linkages between them and other areas of the city centre.

b. Development proposals must reference inter-relationships to heritage assets and ensure the primacy of Coventry Cathedral is retained in townscape.

c. Development proposals must fully explore opportunities to reinforce the cultural offering of the City.

Civic Area

a. New development within the Civic Area must have regard to its historic characteristics of public service provision. As such, the following uses are encouraged :

- High Quality Residential Dwellings
- Social and community uses;
- Leisure and recreation uses;
- Educational uses, including new university and research provisions;
- Office use;

b. Other commercial activities will be supported where they support the provision of active frontages within a mixed use development.

c. The provision of new retail development is unlikely to be supported within the Civic Area unless it can be demonstrably shown to form an integral part of a mixed-use scheme.

d. Opportunities to expand the programme of public realm improvements will be supported

Far Gosford Street Area

a. New developments, changes of use and conversions within the Far Gosford Street Area must respect and reflect the area's historic character. As such all development proposals, including applications for signage and the provision of new and improved parking (for cars and cycles), within the area will only be considered acceptable if they demonstrate that they respect the historic environment of the area.

b. To support the local centre designation a mix of creative industries, employment, residential and social and community uses will be supported within the Far Gosford Street Area.

c. The use of upper floors of buildings for residential or office use will be supported and encouraged providing that appropriate noise insulation is included to ensure that the use is compatible with ground floor commercial activity.

d. Opportunities to enhance the setting of the exposed River Sherbourne within this Area through improvements to green infrastructure will be encouraged. This should include opportunities to improve wider green linkages beyond the city centre boundary, especially towards the Heritage Park at Charterhouse.

Stoney Stanton Road Area.

a. New developments within the Stoney Stanton Road Area must have regard to its established character; respond to the environmental issues associated with its proximity to the Ring Road and deliver high quality buildings and public space which reflect this areas position as a gateway to the city centre.

b. All prospective developments should:

- reflect and enhance the area's character through mixed-use developments;
- improve and introduce high quality buildings;
- Promote active travel and ensure it becomes easier and safer to move within the area and into adjoining parts of the city centre
- Mitigate the negative environmental impacts of the Ring Road;

c. The conversions of existing buildings, where appropriate, and the development of small infill opportunities for new residential developments will be encouraged and supported in principle.

Corporation Street Area

a. All development proposals within the Spon Street Conservation Area, including applications for signage, will only be considered acceptable if they demonstrate that they respect the historic environment of the area.

b. Spon Street will be encouraged as a suitable and attractive location for specialist and independent retailers. In order to protect the availability of property for such use, further hot food takeaways will be resisted.

c. Development must be of high-quality design that both relates well to the modern Belgrade Plaza development whilst ensuring the setting of adjacent listed buildings and Spon Street Conservation Area is preserved

d. Opportunities to improve the linkages into the precinct area will be encouraged from Corporation Street, Spon Street and Belgrade Plaza

e. Opportunities to improve the linkages into the Corporation Street Area from the West will be encouraged.

Mixed Use Core

Including the Primary Shopping Area

a. The primary shopping area is defined as per core Retail policy R2.

b. Other proposals that would introduce new town centre uses within the PSA will be encouraged and supported where they do not undermine or conflict with this or any other policy.

c. Opportunities for new residential provision above new or existing ground floor town centre uses will be supported with a view to supporting the vitality and viability of the city centre as a whole.

d. Opportunities to reinforce the original design concept of the Gibson plan and the precinct cross will be encouraged and supported

e. Development proposals should reference the variety of typologies found in the surrounding context, including the heritage assets of the precinct area.

Parkside Area

a. Development proposals within the Parkside area, should support the hi-tech character that has been developed within this part of the city centre. As such, the following uses will be acceptable:

- Hi-Tech industry use;
- Research and Development activity;
- Other Education facilities;
- Residential provision;
- Leisure and recreation uses;
- Social and community uses;
- Office use;
- Car parking;

b. Improvements in pedestrian connections from the area around Junction 5 toward London Road Cemetery to the South will be encouraged

University and Enterprise Area

a. Within the University and Enterprise Area, proposals for redevelopment, refurbishment, extension or conversion of buildings for the following uses will be supported subject to high quality building and landscape design:

i. Education and faculty buildings;

ii. University administrative facilities;

iii. Supporting ancillary sport, recreation, retail and maintenance facilities;

iv. Research facilities;

v. Residential provision including student accommodation.

b. Proposals to bring the Grade I listed Whitefriars Monastery into appropriate and regular use will be strongly supported subject to that use not having a detrimental impact upon the architectural and historic interest of the building and surrounding public realm. Proposals shall respect the design unity of this part of the University and Enterprise area.

c. University Square shall remain as an attractive public square at the interface of Coventry Cathedral, the Herbert Art Gallery and Museum and Coventry University.

Northern Regeneration Area

a. Proposals supporting the aims of mixed-use redevelopment of the Area will be encouraged.

b. The area will be primarily promoted for new residential development in a range of types and tenures although a range of other uses will be acceptable subject to conformity with other parts of this AAP. These include:

- Office;
- Retail and commercial;
- Social, community and leisure uses;
- Education uses (including those linked to the university);

Such uses should contribute towards active frontages at ground floor level.

c. Green and blue infrastructure should form an integral part of all development proposals within the area. This should include the consideration of deculverting where possible and viable.

d. New development opportunities should not conflict with any other policies within this Local Plan.

e. Swanswell Pool is of historic importance to the local area and the city centre as a whole. Opportunities to expand the park and enhance its quality will be supported. This should include opportunities to improve its linkages to the wider city centre.

f. Proposals for the redevelopment of White Street Coach Park will be encouraged, where they are linked to appropriate amendments to Ring Road junction 2

The Warwick Row Area

a. Proposals for limited and sympathetic infill development in the Warwick Row area will be encouraged and supported where appropriate.

b. Applications for conversions or changes of use will be considered on the basis of their relationship with adjoining buildings and uses. Where appropriate, proposals should complement existing styles and designs of adjoining buildings.

c. Proposals should enhance the character and quality of the local environment and be compatible with other Local Plan policies.

d. Greyfriars Green will continue to be protected as a conservation area and an important 'green' asset to the city centre. Any development proposals that would erode the character of the Green and damage the setting of the listed buildings will not be accepted.

15. Infrastructure Delivery, Implementation and Monitoring

Context

15.1 The delivery of infrastructure to support the growth identified in the Local Plan will require a partnership approach. As a Local Authority, Coventry City Council has a number of responsibilities and obligations it has to meet and therefore has a pivotal role as an infrastructure and service provider. The roles the Council currently fulfils include:

- Local Planning Authority
- Local Highway Authority
- Local Education Authority
- Waste and Minerals Authority
- Strategic Housing Authority
- Social Care Service Provider
- Lead Local Flood Authority
- Public Health

15.2 The Council has an important role to play in setting the level of and securing developer contributions to deliver the necessary infrastructure to support development. The Council will work closely and in partnership with a number of organisations across both the public and private sector to achieve this. As a major landowner within Coventry, the Council will play a leading role in bringing sites forward for development.

15.3 There are close links between Coventry and the rest of the West Midlands and Warwickshire. This includes Local Authorities, and the West Midlands Combined Authority, and ongoing discussions have taken place on a number of key issues, including housing and economic growth. The Council will work with these neighbouring authorities and organisations to ensure that cross boundary infrastructure issues are addressed to help deliver growth and development in the area.

15.4 Organisations in the public sector as well as other agencies are also responsible for meeting their statutory obligations and responding to growth.

15.5 The Council will continue to work closely with partners to maximise funding opportunities and to identify the most effective and timely delivery mechanisms for the necessary infrastructure.

15.6 The Infrastructure Delivery Plan along with explanatory text is contained at Appendix 7

Policy IM1: Developer Contributions for Infrastructure

1. Development will be expected to provide, or contribute towards provision of:

   a. Measures to directly mitigate its impact and make it acceptable in planning terms;
   b. Physical, social and green and blue infrastructure to support the needs associated with the development

2. Infrastructure and mitigation measures will be provided in a timely manner to support the objectives of the Plan.

3. The Council will, where appropriate, seek to secure site-specific infrastructure investments and/or contributions as well as off-site contributions and/or investments. The nature and scale of these will be related to the form of development and its potential impact on the site and surrounding area. The cumulative impact of developments will also be taken into account.

4. Developer contributions will contribute towards strategic infrastructure required to support the overall development in the Plan as defined in the Infrastructure Delivery Plan.

5. Where site specific issues generate viability concerns, applicants should discuss these with the Council at the earliest possible stage in the development process. Proposals that are unable to comply with the Plan's policies on viability grounds must be accompanied by a detailed Viability Assessment.

6. The Council will work in partnership with infrastructure providers and other delivery agencies in updating the Infrastructure Delivery Plan to ensure an up to date evidence base regarding infrastructure requirements and costs is maintained.

Coventry City Council Local Plan Review

Erratum statement

1) The Regulation 19 Proposed Submission Document is missing Policy DS4 (Part C) which relates to Keresley SUE Specific Masterplan Principles. This should have been included on page 23 /24 after Paragraph 3.25 of the Proposed Submission Document. The proposed policy change is minor as set out in the Guidance Note https://www.coventry.gov.uk/downloads/file/44128/guidance-note-local-plan-proposed-policy-updates-and-changes

Policy DS4 (part C) should read:

Keresley SUE Specific Masterplan Principles

In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:

i) Incorporate the recommendations of the Council's SUE Design Guidance SPD;

ii) Ensure that the planned Local Centre is in accordance with Policy R1;

iii) Ensure the new defensible boundaries to the Green Belt are clearly supported on the western side of the site to Tamworth Road and to the north around Thompsons Lane;

iv) Establish a comprehensive green and blue infrastructure corridor focused around the Ancient Woodlands, Hounds Hill and the Hall Brook. This corridor should run north-south between the Burrow Hill Fort to the north and the Jubilee Woodland to the south east; and

v) Identify clear access points to the site and make appropriate provisions for new transport infrastructure and highway improvements to support the comprehensive delivery of the site. This should include:

a. The provision of a new Link Road in accordance with Policy H2. The Link Road should be operational to traffic prior to the full completion of all development components within the SUE;

b. The delivery of the Link Road should not be to the detriment of ProLogis Park; and

c. The management of the existing highway junctions at Bennetts Road, Tamworth Road, Fivefield Road, Sandpits Lane, Thompsons Lane, Long Lane and Watery Lane to ensure they continue to operate in a safe and appropriate way.

2) The Regulation 19 Proposed Submission Document contains policy R1, points 2 and 3 incorrectly within the table of policy R1 point one 'New Eastern Green Local Centre'. The proposed policy change is minor, and listed within the Regulation 19 Guidance Note https://www.coventry.gov.uk/downloads/file/44128/guidance-note-local-plan-proposed-policy-updates-and-changes

Coventry Local Plan Review 2021 - 2041

Regulation 19 Proposed Submission Appendices

December 2024

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Appendix 1 - Table of reviewed policies for the Local Plan and Area Action Plan

Table 1: Local Plan reviewed policies

Policy reference	Policy heading	Policy status (Updated / no change / deleted / new policy	Strategic policy?
DS1	Overall Development Needs	Updated	Yes
DS2	The Duty to Cooperate and partnership working	Minor update	Yes
DS3	Sustainable Development Policy	Minor update	Yes
DS4 (Part A)	General Masterplan principles	Updated	Yes
DS4 (Part B)	Whitley Specific Masterplan Principles	Minor update	No
DS4 (Part C)	Keresley SUE Specific Masterplan Principles	Minor update	No
DS4 (Part D)	Eastern Green SUE Specific Masterplan Principles	No change	No
HW1	Health and Health Impact Assessment (HIA)	Updated	Yes
JE1	Overall Economy and Employment Strategy	Updated	Yes
JE2	Provision of Employment Land and Premises	Updated	Yes

JE3	Non-Employment Uses on Employment Land	Updated	No
JE4	Location and Type of Office Development	Updated	No
JE5	Industrial and Storage/Distribution Development	Updated	No
JE6	Tourism/Visitor Related Development	Updated	No
JE7	Accessibility to Employment Opportunities	Updated	No
JE8	Location of Research and Development (R&D)	New Policy	No
H1	Housing Land Requirements	Updated	Yes
H2	Housing Allocations	Updated	Yes
H3	Provision of New Housing	Updated	Yes
H4	Securing a Mix of Housing	Updated	No
H5	Managing Existing Housing Stock	Updated	No
H6	Affordable Housing	Updated	No
H7	Gypsy and Traveller Accommodation	Updated	No
H8	Specialist Housing including Specialist Housing with Elements of Care, Older Persons accommodation and hostels	Updated	No

H9	Residential Density	Updated	No
H10	Student Accommodation	Updated	No
H11	Homes in Multiple Occupation (HMOs)	Updated	No
H12	Build to Rent	New policy	No
H13	Co-Living	New policy	No
R1	Delivering Retail Growth	Updated	No
R2	Coventry City Centre – Development Strategy	Updated	No
R3	The Network of Centres	Updated	Yes
R4	Out of Centre Proposals	Updated	Yes
R5	Retail Frontages and Ground Floor Units in Defined Centres	Minor update	No
R6	Restaurants, Bars and Hot Food Takeaways	Minor update	No
CO1	New or Improved Social, Community and Leisure Premises	No change	No
CO2	Re-use of or Redevelopment of Facilities	Minor update	No
CO3	Neighbourhood and Community Planning	No change	No
GB1	Green belt	Updated	Yes
GB2	Safeguarded Land in the Green Belt	Updated	Yes

GB3	Local Green Space	New policy	Yes
GE1	Green and Blue Infrastructure	Updated	Yes
GE2	Green Space	Updated	No
GE3	Biodiversity, Geological, and Landscape Conservation	Updated	No
GE4	Tree Protection	Updated	No
DE1	Ensuring High Quality Design	Updated	Yes
DE2	Delivering High Quality Places	New policy	No
HE1	Conservation Areas	Updated	Yes
HE2	Conservation and Heritage Assets	Updated	Yes
HE3	Heritage Park - Charterhouse	No change	No
HE4	Archaeology	New policy	No
AC1	Accessible Transport Network	Updated	Yes
AC2	Road Network	Updated	No
AC3	Demand Management	Updated	No
AC4	Active Transport Provision including Walking, Cycling and Micro Mobility	Updated	No
AC5	Bus, Demand Response Transit and Rapid Transit	Updated	No
AC6	Rail	Updated	No
AC7	Freight	Updated	No

EM1	Planning for Climate Change Adaptation	Updated	Yes
EM2	Building Standards	Deleted	No
EM3	Renewable Energy Generation	Deleted	No
EM4	Flood Risk Management	Updated	No
EM5	Sustainable Drainage Systems (SuDS)	Updated	No
EM6	Redevelopment of Previously Developed Land	Updated	No
EM7	Air Quality	Updated	No
EM8	Waste Management	No change	No
EM9	Safeguarding Mineral Resources	No change	No
EM10	Non Mineral Development in Mineral Safeguarding Areas	No change	No
EM11	Energy Infrastructure	New policy	No
EM12	Reducing operational carbon in new build non-residential development	New policy	No
EM13	Overheating in new buildings	New policy	No
EM14	Embodied carbon and waste	New policy	No
EM15	Noise	New policy	No
C1	Broadband and Mobile Internet	Deleted	No
C2	Telecommunications	Deleted	No

CC1	City Centre Policy Parts A-E	New policy (see below regarding transfer from the Area Action Plan)	No
IM1	Developer Contributions for Infrastructure	Updated	No

Table 2: Area Action Plan Policies review

Policy reference	Policy heading	Moved / deleted?	Comments (eg if moved, where, if deleted, why - summary)
CC1	Coventry City Centre – Development Strategy	Moved	Retained, updated and included in the core local plan policy CC1 (Part A) - Coventry City Centre Development Strategy.
CC2	City Centre Heritage	Deleted	Deleted and incorporated into core local plan policies HE2 and HE4.
CC3	Building Design	Deleted	Deleted as duplicates core local plan policy.
CC4	Public Art	Deleted	Deleted as relates to the whole area so now in core local plan policy DE2.
CC5	Lighting	Deleted	Deleted as relates to the whole area so now in core plan policy DE2.
CC6	Public Realm	Deleted	Deleted as relates to the whole area so now in core plan policy DE2.
CC7	Tall Buildings	Deleted	Deleted and incorporated into revised core plan policy DE1.
CC8	Green and Blue Infrastructure	Moved	Retained and updated within Policy CC1 (Part B) - Green and Blue Infrastructure.

CC9	Drainage & Flood Risk	Moved	Retained but revised within Policy CC1 (Part C) - Drainage and Flood Risk.
CC10	Environmental Management	Moved	Retained and revised within Policy CC1 (Part D) - Environmental Management.
CC11	Accessibility	Deleted	Deleted and incorporated into AC policies and referenced in CC1 (Part E) - City Centre Character Area.
CC12	Friargate	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC13	Cathedrals and Cultural Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC14	Civic Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC15	Far Gosford Street Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC16	Health and Education Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC17	Leisure and Entertainment Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC18	The Primary Shopping Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC19	Primary Shopping Area Regeneration - South	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.

CC20	Primary Shopping Area Regeneration - North	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC21	Cathedral Lanes	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC22	Primary and Secondary Frontages	Moved	Retained but revised within Policy CC1 (Part e) - City Centre Character Area.
CC23	Technology Park Area - Parkside	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC24	University and Enterprise Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC25	Regenerations Areas	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC26	The Warwick Row Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.

Appendix 2 - Marketing Guidance to support Policies JE3 and CO2

Developer Marketing Standards – Policy JE2

Where a sites or premises owner is applying to the Council for change of use from employment to an alternative use, they have to prove there is a lack of demand for that site or premises. This table itemises the various marketing tools that should typically be used to market the interest.

Should these tools fail to identify potential purchasers or occupiers then it may be considered that there is a lack of employment demand for the site or premises in question.

Marketing tool	Individual building (premises)	Small Site (< 1ha)	Mid-Range Site (1-10ha)	Larger Site (>10ha)
On-site Marketing Board in prominent position	✓	✓	✓	✓
Targeted site promotion with Local Property Agents / Developers / Investors	✓	✓	✓	✓
Targeted site promotion with Regional Property Agents / Developers / Investors	✓	N/A	✓	✓
Targeted site promotion with National Property Agents / Developers / Investors	N/A	N/A	N/A	✓
Liaise with CWLEP and the Councils Inward Investment Team	✓	✓	✓	✓
Produce Marketing Particulars	✓	✓	✓	✓
Promotion on appropriate marketing website	✓	✓	✓	✓
Marketing Period (months)	6	6	9	12

Developer Marketing Standards – Policy CO2

Where a sites or premises owner is applying to the Council for change of use from a Social, Community or Leisure use to an alternative use (outside of the scope of chapter 6 of the Local Plan), they will need to demonstrate that there is a lack of demand for that site or premises.

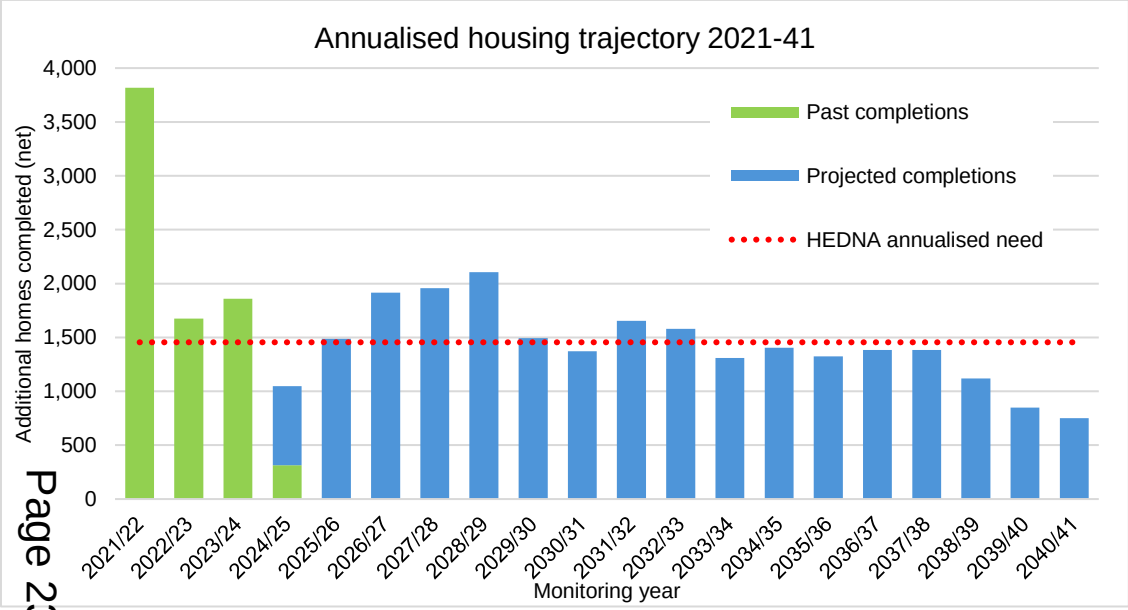
This table itemises the various marketing tools that should typically be used to market the interest.

Should these tools fail to identify potential purchasers or occupiers then it may be considered that there is a lack of demand/need for the site or premises in question.

Marketing tool	Premises	Vacant land
On-site Marketing Board in prominent position	✓	✓
Targeted site promotion with Local Property Agents / Developers / Investors	✓	✓
Liaise with CWLEP and the Councils Inward Investment Team	✓	✓
Promotion on appropriate marketing website	✓	✓
Marketing Period (months)	3	3

Appendix 3 - Housing Trajectory

Housing supply type	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41
Past completions																				
Gross new build	3,447	1,426	1,430	315	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Net conversions & change of use	520	252	432	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Demolitions	-149	-4	-3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Projections (net)																				
Under construction	0	0	0	746	997	853	301	477	131	40	0	0	0	0	0	0	0	0	0	0
Detailed consent	0	0	0	-17	368	1,017	1,343	1,280	435	353	191	0	0	0	0	0	0	0	0	0
Outline consent	0	0	0	0	1	25	112	150	542	460	685	685	569	335	335	335	335	320	225	200
Permitted development	0	0	0	4	122	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Existing Allocations (without permission)	0	0	0	0	0	0	0	0	72	75	125	176	225	445	365	250	225	225	275	275
Proposed Allocations (without permission)	0	0	0	0	0	0	0	0	60	90	353	365	225	325	375	535	575	375	150	75
HELAA sites not allocated	0	0	0	0	0	0	0	0	54	154	101	153	90	99	50	65	50	0	0	0
Small site windfall allowance	0	0	0	0	0	0	200	200	200	200	200	200	200	200	200	200	200	200	200	200
Totals																				
Past completions 2021-24	3,818	1,674	1,859	315	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Projected completions 2024-41	0	0	0	733	1,488	1,915	1,956	2,107	1,494	1,372	1,655	1,579	1,309	1,404	1,325	1,385	1,385	1,120	850	750
Projected cumulative completions 2021-41	**3,818**	**5,492**	**7,351**	**8,399**	**9,887**	**11,802**	**13,758**	**15,865**	**17,359**	**18,731**	**20,386**	**21,965**	**23,274**	**24,678**	**26,003**	**27,388**	**28,773**	**29,893**	**30,743**	**31,493**
Cumulative local housing need (1455 p/yr)	1,455	2,910	4,365	5,820	7,275	8,730	10,185	11,640	13,095	14,550	16,005	17,460	18,915	20,370	21,825	23,280	24,735	26,190	27,645	29,100
Cumulative +/- performance vs need	2,363	2,582	2,986	2,579	2,612	3,072	3,573	4,225	4,264	4,181	4,381	4,505	4,359	4,308	4,178	4,108	4,038	3,703	3,098	2,393



5YHLS 2024/5 to 28/29	Net additional Homes	+5% buffer
Local housing need 2021-2041*	29,100	
Net completions Apr 2021 to Sep 2024	7,666	
Remaining need 2024-41	21,434	
Remaining annualised need 2024-41	1,261	1,324
5-year need 2024-2029	6,305	6,620
Deliverable supply 2024-2029	8,514	
5YHLS 2024-2029 (in years)	**6.75**	**6.43**

*Local housing need established by the Coventry and Warwickshire HEDNA 2022

Appendix 4 - Ancient Woodlands Map and List

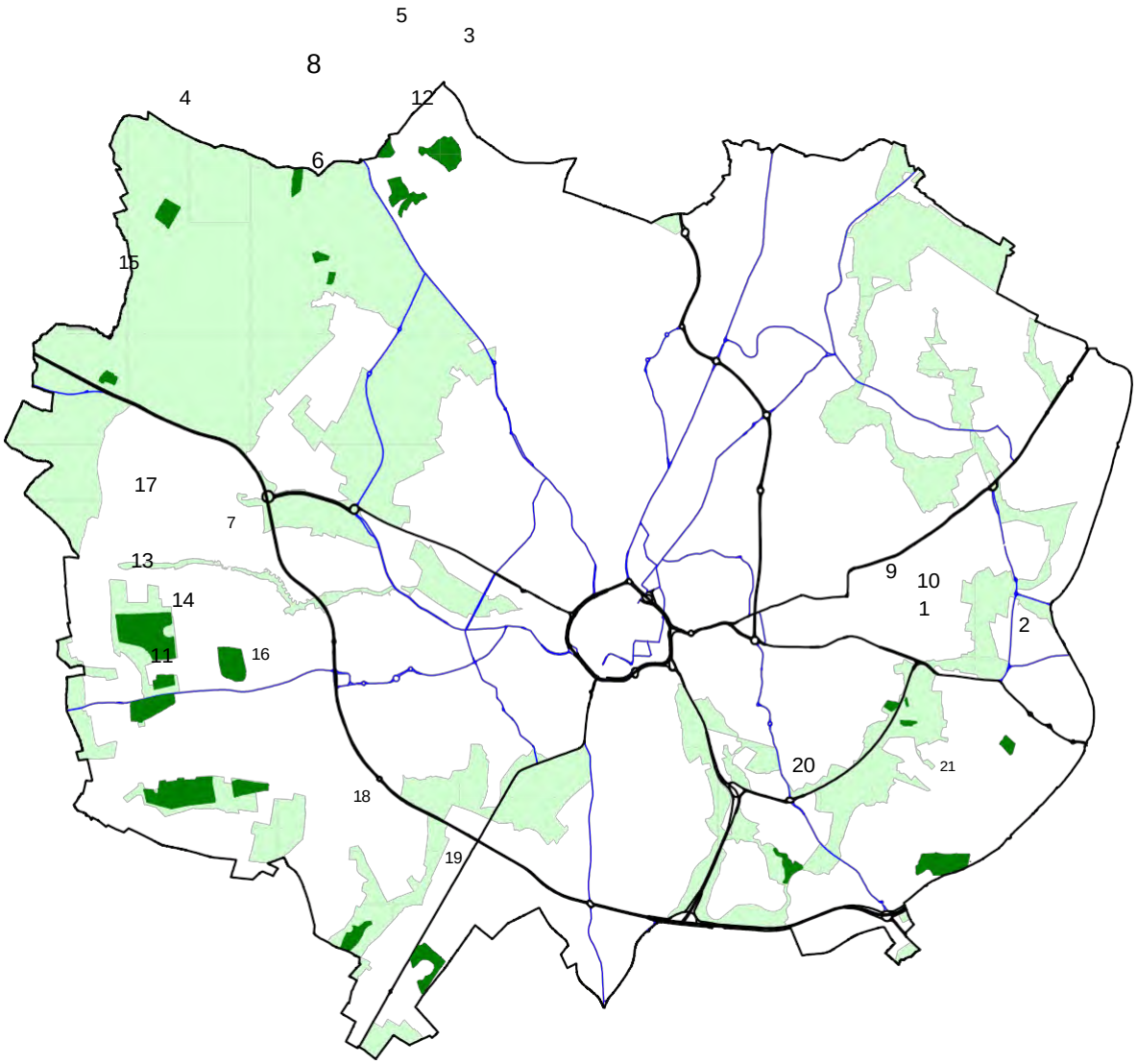
List of Ancient Woodlands

Planted AncientWoodland (PAWS)

Ancient Semi Natural Woodland (ASNW)

1. The Alders (ASNW)
2. Binley Little Wood (ASNW)
3. Bunson's Wood (ASNW)
4. Elkin Wood (PAWS)
5. Hall Yard Wood (ASNW)
6. Hawkes End Wood (ASNW)
7. Limbrick Wood (ASNW)
8. Long Lady Wood (PAWS)
9. Moore Field Wood east (ASNW)
10. Moore Field Wood west (ASNW)
11. Park Wood (ASNW and PAWS)
12. Pickhorne Wood (ASNW)
13. Pig Wood (ASNW)
14. Plants Hill Wood (PAWS)
15. Plinkett's Wood (PAWS)
16. Ten Schilling Wood (PAWS)
17. Tile Hill Wood (SSSI) (ASNW)
18. Tocil Wood (ASNW)
19. Wainbody Wood (ASNW and PAWS)
20. Whitley Grove (ASNW and PAWS)
21. Willenhall Wood (ASNW and PAWS)

NB: This list only includes woodlands over 2 acres in size



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Coventry City Council

Appendix 5 – Heritage Park and Route Inset Map

Appendix 6 - Cycle and Parking Standards for New Development

Introduction

1.1 This appendix sets out standards for car and cycle parking associated with new development and changes of use in Coventry. The standards include requirements for electric car charging points and the provision of parking for people with disabilities.

1.2 These standards should be applied in combination with the main policies set out in the Coventry Local Plan, and specifically policy AC3.

Relevant Local and National Car Parking Policy

1.3 The National Planning Policy Framework (NPPF) (December 2023) sets out the Government's approach to car parking standards stating in paragraph 111 that if setting local parking standards for residential and non-residential development, policies should take into account:

- the accessibility of the development
- the type and mix of the proposed development
- the availability of and opportunities for public transport
- local car ownership levels
- the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

1.4 The approach to car parking associated with new development as set out in this Appendix has been informed by and seeks to enable the objectives set out in a range of adopted city council strategies. Of particular importance are the 2023 Coventry Transport Strategy and the 2023 Climate Change Strategy.

1.5 The Transport Strategy notes the continued widespread reliance on the car across the city whilst also setting out the "Case for Change" and the priority of modal shift away from the private car. To this end, the aim of these parking standards is to enable appropriate and consistent levels of car parking across the city whilst encouraging behaviour change towards public transport and active travel in the most accessible areas of the city.

Background

1.6 Coventry is a compact highly accessible city with a well-developed and maintained road network. The density, type and accessibility of housing varies greatly across the city, but typically Coventry is made up of large areas of terraced and semi-detached housing, in many cases with little or no
off-street car parking. In more suburban lower density areas of the city, levels of car ownership levels are typically higher, but even with an increased availability of off-street parking, levels of on-street parking frequently remain high.

1.7 Since their adoption in 2017 the application of parking standards has successfully enabled car-free development in the City Centre. In order to ensure the effectiveness of this policy approach and prevent an overspill of car parking into local residential areas, the Council has encouraged the creation of Resident Parking Schemes around the periphery of the city centre. It is considered that the application of appropriate levels of car parking and the completion of a ring of residents parking zones around the edge of the city centre alongside a continued programme of promoting sustainable travel modes will help to deliver the objectives of the Local Plan and the Transport Strategy.

Approach of these Standards

1.8 The availability of car parking can have a major impact on local traffic management and safety issues. It is therefore essential to try and get the balance right of ensuring that adequate levels are provided to manage inappropriate parking without providing excessive levels which dominate the built environment and overtly encourage car use.

1.9 The Local Plan includes policies setting out a balanced approach to supporting the movement needs of local residents and businesses in a growing city. Those polices recognise the role of the car in supporting connectivity to areas in and around Coventry, but also actively encourage sustainable and active modes of travel to help address traffic congestion, air quality and health issues.

1.10 The quality and accessibility of public transport, walking and cycling routes to key services can influence how people travel, for example, people living in or near the city centre are less likely to be reliant on car use, hence there will be a reduced need for car parking compared to less accessible areas of the city. The City Council is also exploring options for the introduction of car clubs, with a focus on the city centre, which support more efficient and flexible models of car ownership.

1.11 Recognising the variances in car ownership and accessibility across the city, the standards set out in this document are based on three distinct zones:

1) **City Centre (all sites within the city centre as defined in Figure 1 and on the Policies Map)**

A presumption in favour of car-free development will apply to all applications within the City Centre (as defined in Figure 1 and on the Policies Map). Proposals for development that include parking provision will be considered on a site-by-site basis based upon the merits of the application and criteria in the NPPF, as set out in paragraph 1.3 above.

2) **Transition Zone (as defined in Figure 2 and on the Policies Map)**

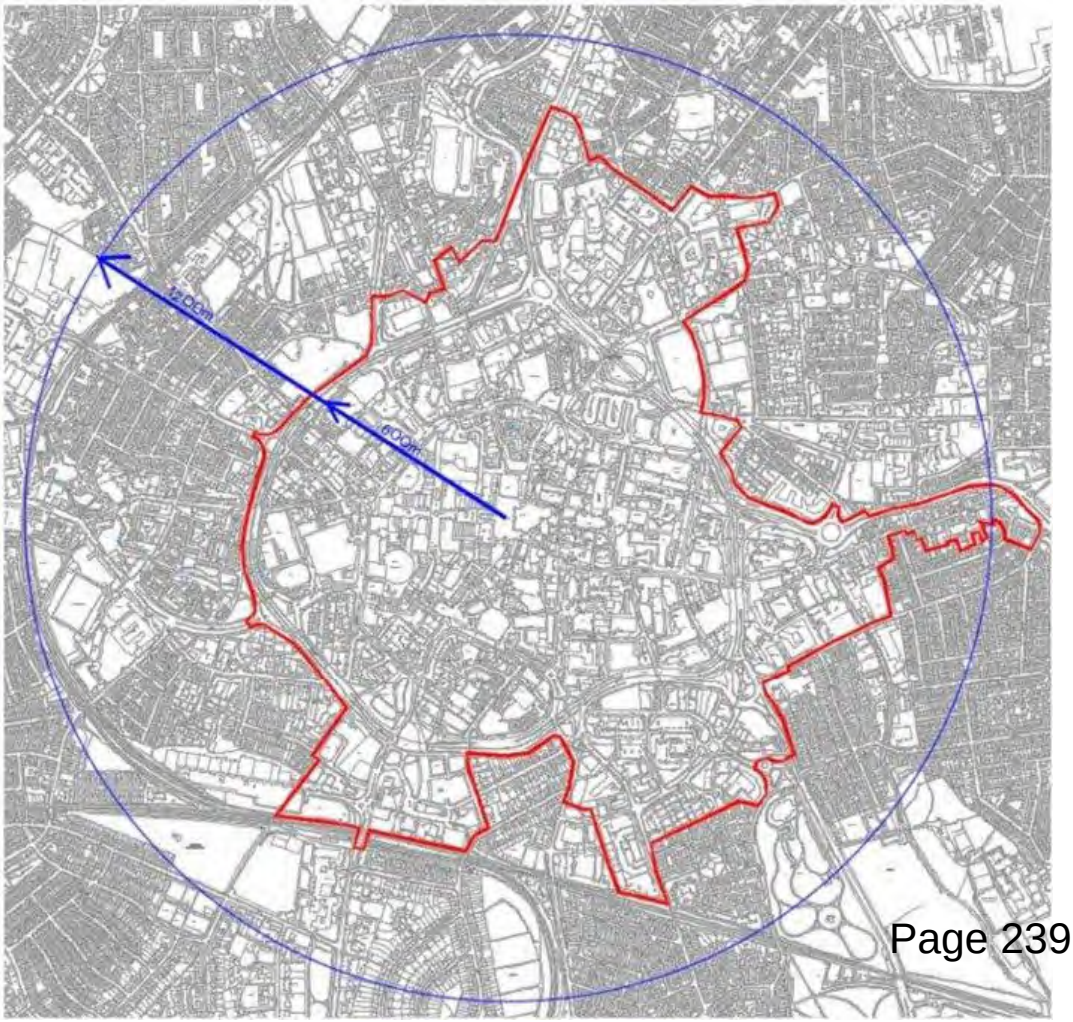
Within the Transition Zone, applications will be required to provide 50% of the parking standard required for the Outer City (see below). Any variation from this standard must be justified using the criteria set out in paragraph 1.3 above.

3) **Outer City** (all other areas within the council's administrative boundary but outside of the Transition Zone)

Within the Outer City, applications will be required to provide the level of car parking set out in Table 1 of this Appendix. Any variation from this standard must be justified using the criteria set out in paragraph 1.3 above.

Figure 1 – City Centre and Outer City

Figure 2 – City Centre and Transition Zone



1.12 It is recognised that there may be exceptional circumstances which may justify a lower level of parking provision to be appropriate. Exceptional circumstances are as defined within the Coventry Connect SPD. In such cases this would need to be fully and appropriately justified with detailed supporting evidence and referencing the standards in this guidance. In most cases this should be included within the associated Transport Statement or Assessments which should include:

1.13 Surveys of parking capacity and occupancy levels on surrounding streets and parking areas

1.14 Consideration of likely trip generation and parking accumulations for the proposed development with supporting evidence that this will be exceptional.

1.15 Details of how the parking will be managed.

1.16 This is not considered to be an exhaustive list, and there may be other factors associated with the specific characteristics of each site which may need to be considered. In all cases, where an applicant is considering a departure from the standards, the Council encourages early pre- application discussions.

1.17 Where a reduction in parking could lead to a transfer of parking into other locations, appropriate financial contributions may also be required for the introduction or expansion of Residents Parking Schemes.

2 Car Parking Standards

2.1 The standards set out in Table 1 below show the detailed car parking standards expected for each type of land use. These should be applied in accordance with the supporting guidance notes provided below.

2.2 Care should be taken to ensure that parking is well designed, easily accessible and is sympathetic to the surrounding environment, particularly in residential areas. Unallocated parking spaces required for visitor parking in residential areas should be seamlessly integrated into the public realm to reduce the visual impact, and be suitably located so that they do not cause obstructions to other users.

Parking for Electric Vehicles

2.3 As set out in policy AC3, the City Council is supportive of an uptake in low emission and electric vehicles. In order to ensure that all new developments are equipped with the necessary infrastructure, new developments will be expected to include, where practical, appropriate provision for electric car charging points. Electric vehicle parking should be counted as part of the total parking provision, and bays should be clearly marked.

2.4 Proposals should provide for the provision for electric car charging points in accordance the building regulation standards.

2.5 For larger developments, details of how electric vehicle charging will be allocated, located and managed should, where applicable, be included within the relevant Transport Assessments or Transport Statement. The management of the charging points, including the mechanism/procedure for charging, will be the responsibility of

the developer/occupier.

2.6 In cases where charging points, including infrastructure to enable retrofitting, cannot be provided within the development site, developer contributions may be sought to enable those facilities to be suitably provided in other locations including public car parks or on-street parking spaces.

2.7 Inclusive mobility: making transport accessible for passengers and pedestrians, DfT January 2022, provides details on a recommended technical specification for electric charging points and should therefore be referred to in conjunction with these standards.

Parking for People with Disabilities

2.8 In accordance with the City Council's objectives to promote equality, accessibility and to be an Age Friendly City, new developments must incorporate provision for blue badge holders. New developments, excluding individual dwellings with private off street parking, will be expected to allocate 5% of the total parking provision for blue badge holders. These spaces should be appropriately designed to meet the requirements of people with reduced mobility in accordance with good practice such as the Department **for** Transport's Inclusive mobility: making transport accessible for passengers and pedestrians, DfT January 2022, or future equivalent.

Parking for Goods Vehicles

2.9 In accordance with Local Plan Policy AC7 appropriate off-street parking, loading/unloading, waiting and turning areas should be provided for HGVs to prevent obstructions to the highway causing delays and road safety issues. Each application will be assessed on its own merits.

2.10 It will be necessary to demonstrate in the application and through Transport Statements / Transport Assessments how goods vehicles will be managed as part of the proposed development, particularly in areas where the presence of HGVs has the potential to cause traffic management and road safety issues.

Drop-Off and Loading Areas

2.11 Parking for coaches to set passengers down and pick them up will be considered appropriate and necessary for certain uses and developments, most notably those which are leisure related.
However, this requirement will be unique to each site and therefore will be considered on a case by case basis.

2.12 For education establishments, appropriate provision for safe drop-off facilities should be considered to discourage inappropriate on-street parking. The level of provision will be determined on the merits of the application and the characteristics of the site and surrounding area.

Cycle Parking Standards

2.13 Fear of theft or damage to the cycle is often cited as a major deterrent to cycling. Well- planned and secure cycle parking is therefore an essential element in increasing the level of cycle use. The provision of cycle parking must be considered early in the planning and design process.

2.14 The standards in table 1 apply to all areas in the city, and specify different requirements for staff, residents, pupils/students and customers or visitors. This is because staff, residents and pupils/ students require cycle parking that is more secure for long-stay use whereas customers or visitors will usually be parking for a shorter period.

2.15 To increase the attraction of commuting by cycle, it is important to provide facilities for cyclists at their destinations. These facilities should include changing areas, storage areas for personal items and space to dry wet clothing and showers.

Design Details

2.16 To discourage theft or vandalism, cycle parking should be secure, well lit, clearly signed and situated in prominent, accessible and convenient locations that benefit from casual surveillance by passers- by and more formal surveillance by staff or CCTV. It should also be located within a short distance of the main entrance(s) to the building(s), closer than the car parking provision to encourage bike use.

2.17 The use of 'Sheffield' stands is recommended as a minimum and is especially suitable for customer or visitor parking. The 'Sheffield' stand is a single 50mm diameter tube with two right angle bends and provides for two cycles. A detailed specification is shown at Figure 1 below.

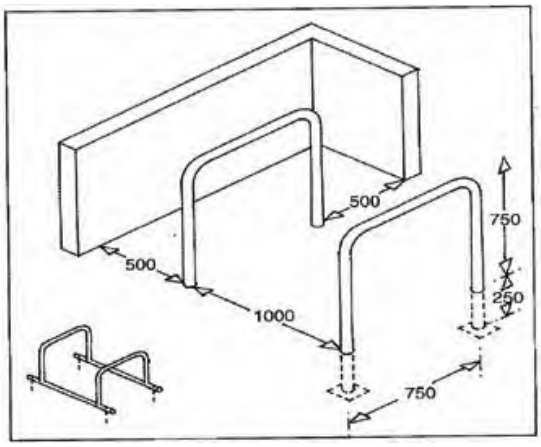
2.18 Developments should cater for a variety of bikes and bike sizes, which includes smaller bikes for children and non-standard / larger bikes such as cargo bikes. Providing cycle parking to meet the needs of all users will better encourage modal shift and help to provide for changing mobility. Child cycle parking should be provided particularly when delivering cycle parking in green spaces, such as MUGA's and LEAP's, at schools and outside retail premises. Cycle parking that caters for child bikes should use M-Stands or Bilton Cycle Stands, which are a variation of a Sheffield Stand with a mid-bar to lock smaller bikes to. LTN 1/20 provides guidance for cargo and non-standard cycle parking.

2.19 Cycle Parking should be covered and enclosed for protection from the elements. Access should be step free and it should be well-lit and clearly signed and conveniently located. The detailed design and lighting of these facilities must have regard to the locality and setting of the proposed development.

2.20 In addition to standard cycle parking and to ensure that all new developments are equipped with the necessary infrastructure, new developments will be expected to include, where practical, appropriate provision for safe e-bike parking and charging points. The management of the charging points, including the mechanism/procedure for charging, will be the responsibility of the developer/occupier.

2.21 In cases where charging points, including infrastructure to enable retrofitting, cannot be provided within the development site, developer contributions may be sought to enable those facilities to be suitably provided in other locations.

Figure 3: Sheffield Stand design specification (copyright Institution for Highways and Transportation)



2.22 Cycle parking equipment which only holds one wheel of a bicycle e.g. 'butterfly' clips o concrete slots will not be acceptable. They provide inadequate security and can damage the wheels of a bicycle.

2.23 For long-stay parking for residents, staff and pupils/students, more secure provision will be expected. This should be in the form of cycle lockers, a locked compound with Sheffield Stands provided that they are under cover, enclosed for protection from the elements and located within a secure area (access restricted to staff or similar). Design specifications for cycle lockers and locked compounds are shown in Figures 2 and 3.

Figure 4: Cycle Lockers Design Specification

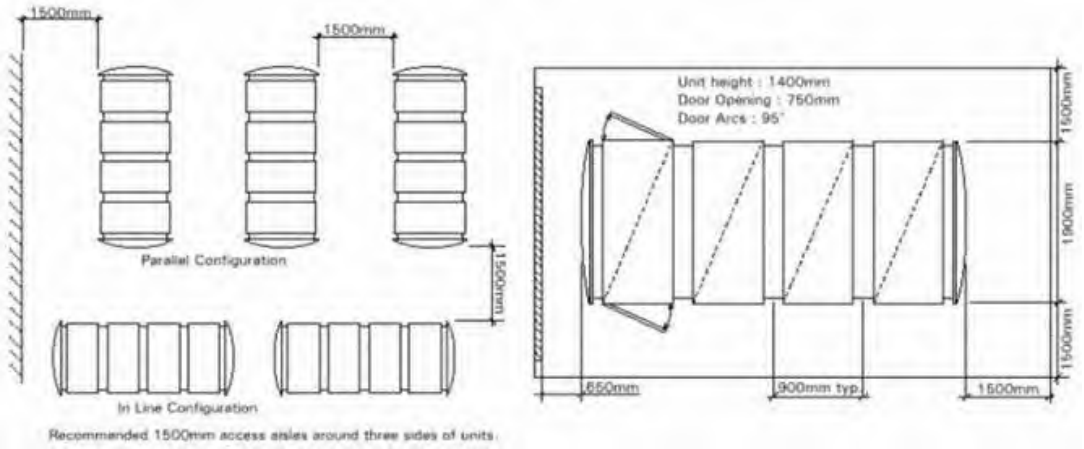
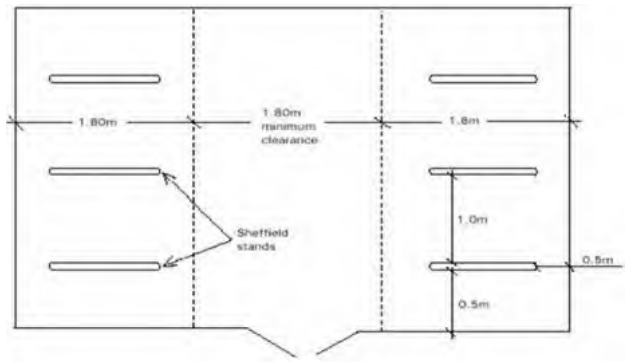


Figure 5: Locked Compound Design



Notes for Table 1

Car Parking Standards

1. All standards should be calculated on external gross floor area (m^2) unless otherwise stated.
2. In order for garages in residential developments to qualify as part of the parking provision they must be a minimum of 3m x 6m internally.
3. Unallocated visitor car parking for C3 residential dwellings should be provided in the form of appropriately marked publicly available spaces. In cases where this is provided as part of the highway, spaces must be seamlessly integrated into the public realm to reduce the visual impact, and be suitably located so that they do not cause obstructions to other highway users.
4. FTE means Full Time Equivalent.
5. Where it is calculated that part of a space is required, this should be rounded up.
6. Provision should be allocated for Blue Badge holders, in accordance with para 2.27 above.
7. Provision should be allocated for electric car charging in accordance with paras 2.22 to 2.26 above.
8. 6% of the total car parking provision should be allocated for people with disabilities / blue badge holders.
9. The recommended minimum dimensions for car parking spaces should be as per Table 1 below. Parking spaces also need to take account of the minimum space requirements set out for electric vehicle charge points in Building Regulations Part S, which vary depending on whether they are free standing, or wall mounted.

Type of Space	Recommended Minimum Dimensions
Standard Parking Space	2.5m x 5.0m
Parallel parking Space	2.0m x 6.0m
Disabled Parking Bay	3.6m x 6.0m (This is equivalent to 2.4m x 4.8m, with an additional 1.2 metres at the side and end of the bay)
Parking Space with EV Charger	2.8m x 5.0m
Garages (Internal sizes)	3.0m x 6.0m

Cycle Parking Standards

10. A Sheffield type stand (see Figure 2 below) is capable of allowing two bicycles to be parked if correctly installed (2 spaces).

11. In most residential developments, the use of suitably sized garages or sheds will be acceptable as cycle storage provision. A method of securing the cycle to a solid wall is encouraged.

12. For flats, maisonettes and managed schemes, secure communal space(s) should be provided on the ground floor or in a basement area provided that ramped access is available.

13. FTE means Full Time Equivalent.

14. All standards should be calculated on external gross floor (m^2) space unless otherwise stated.

Table 3 - Car and Cycle Parking Standards

Use Class	Outer City Car Parking spaces	Inner and Outer City Cycle Parking spaces
E(a) - Shops (m^2) Food	1 per 25m^2	**Under 2,500m^2** 1 per 200m^2 for customers 1 per 400m^2 for staff Minimum of 2 spaces
		Over 2,500m^2 1 per 400m^2 for customers 1 per 600m^2 for staff
E(a) - Shops (m^2) Non-food	1 per 35m^2	1 per 400m^2 for customers 1 per 400m^2 for staff Minimum of 2 spaces
E(c) - Financial and Professional Services	1 per 30m^2	1 per 400m^2 for customers 1 per 400m^2 for staff A minimum of 2 spaces
E(b) - Restaurants and Cafés (dining area m^2)		
E(g)(i) and (ii)- Business/Research & Development	1 per 45m^2	1 per 400m^2 for staff 1 per 400m^2 for visitors Minimum of 2 spaces

E(g)(iii)/B2 - Light or General Industrial	1 per 60m^2	**Under 4,000m^2** 1 per 400m^2 for staff 1 per 750m^2 for visitors Minimum of 2 spaces
		Over 4,000m^2 1 per 500m^2 for staff 1 per 1,000m^2 for visitors
B8 - Storage and Distribution	1 per 100m^2	**Under 4,000m^2** 1 per 400m^2 for staff 1 per 750m^2 for visitors A minimum of 2 spaces
		Over 4,000m^2 1 per 500m^2 for staff 1 per 1000m^2 for visitors

Use Class	Outer City Car Parking spaces	Inner and Outer City Cycle Parking spaces
C1- Hotels	1 per 2 bedrooms+ parking provision for any A3 and D2 uses	1 per 10 staff members (FTE) 1 per 8 bedrooms for customers Minimum of 2 spaces
C2 - Residential Institutions Care & Nursing Homes	1 per 4 bed spaces + 1 per 2 staff members (FTE)	1 per 10 staff members (FTE) 1 per 8 bedrooms for visitors Minimum of 2 spaces
C2 - Residential Institutions - Hospital, nursing home, care home,	1 per 2 staff members (FTE) + and 1 per 2 bed spaces	1 per 10 staff members (FTE) 1 per 20 beds for visitors Minimum of 2 spaces
C2A - Secure Residential Institutions	Parking provision will be considered on a site by site basis.	
Sui Generis - Student Accommodation (Halls of Residence) & C2 - Residential Schools/Colleges	1 per 4 bedrooms (off campus / school / college locations)	1 per 4 bedrooms for students 1 per 20 bedrooms for visitors (See note 12 above)
C3 - Residential Dwellings (per unit) 1 bedroom house/flat	1 per dwelling + 1 unallocated space per 5 dwellings for visitors (See note 3 above)	1 per dwelling (See notes 11 & 12 above)
C3 - Residential Dwellings (per unit) 2 bedroom house/flat	2 per dwelling + 1 unallocated space per 10 dwellings for visitors (See note 3 above)	1 per dwelling (See notes 11 & 12 above)
C3 - Residential Dwellings (per unit) 3 or more bedroom house/flat	2 per dwelling + 1 unallocated space per 5 dwellings for visitors (See note 3 above)	2 per dwelling (See notes 11 & 12 above)
C4 - Houses in Multiple Occupancy	0.75 per bedroom	1 per 3 bedrooms (See notes 11 & 12 above)

(HiMOs)		
E(e) - Medical or Health Services (Non Residential)	Parking provision will be considered on a site by site basis.	1 per 6 staff members (FTE) 0.5 per treatment room for visitors Minimum of 2 spaces
E(f) - Creche, Nursery	1 per 2 FTE staff + appropriate drop off facilities	1 per 10 staff members (FTE), 1 per 15 children for visitors Minimum of 2 spaces
F1(a) - Education Establishment Primary schools	1 per 2 FTE staff + appropriate drop off facilities	1 per 10 staff members (FTE) and 1 per 500 students for visitors 1 per 5 students for student use
F1(a) - Education Establishment Secondary Schools	1 per 2 FTE staff + appropriate drop off facilities	1 per 10 staff members (FTE) and 1 per 500 students for visitors 1 per 5 students for student use
F1(a) - Education Establishment Further / higher education (Colleges and Universities)	1 per 2 FTE staff + appropriate drop off facilities	1 per 10 staff members (FTE) and 1 per 500 students for visitors 1 per 5 students for student use
F1(b), (c), (d), (e) and F2(b) - Art Gallery/ Museum/ Library/Public Hall	1 per 30m2	1 per 10 staff members (FTE) 1 per 20 people expected to use the facility at any one time
F1(f) - Place of Worship	1 per 10m2	1 per 10 staff members (FTE) 1 per 20 people expected to use the facility at any one time
E(d) - Gym/ Fitness Centre	1 per 15m2 public areas	1 per 10 staff members (FTE) 1 per 20 people expected to use the facility at any one time
E(d) - Indoor Sports Hall	1 per 20m2 public areas	1 per 10 staff members (FTE) 1 per 20 people expected to use the facility at any one time
F2 (c) and (d) – Outdoor sport or recreation and swimming pool or ice skating rink		
Sui Generis (other than PBSA)	Parking provision will be considered on a site by site basis.	

Appendix 7- Infrastructure Delivery Plan

Introduction

This Infrastructure Delivery Plan provides an initial overview of the infrastructure required to support the growth identified through Coventry's Local Plan. It also highlights the details that are currently available and important to the costing and delivery of such infrastructure. It has been prepared in consultation with infrastructure providers to ensure that the Plans not only enable new homes and employment premises, but that developments are properly supported by high quality physical, social and green and blue infrastructure, which allows these new places to function as thriving communities and locations for successful business.

The IDP is a 'living document' which will evolve as more information becomes available through detailed planning applications, funding discussions and monitoring. The IDP should be read in conjunction with the Local Plan policies, which set out a positive approach to supporting development across Coventry.

The following sections will provide an overview of infrastructure requirements identified at this time and will be supported by detailed tables which provide guide costs and links to specific development(s). These sections build upon the information contained within Chapter 13 of the Local Plan.

Highways, Public Transport and Supporting Accessibility

Transportation infrastructure is the largest area of infrastructure needed in terms of scale and cost. The transport modelling that has supported the Local Plan has identified a range of schemes that will be essential to the delivery of new homes and jobs across Coventry. Prime examples include a new link road with wider highway improvements to support the Keresley SUE. This will help to create a significantly enhanced transport corridor between the southern end of Coundon Wedge Drive and Junction 3 of the M6. In addition, a new grade separated junction will be created on the A46 near Walsgrave Hill Farm to support new development access and secure a blue light access to the city's hospital. Both of these schemes represent clear commitments to using infrastructure to unlock growth not just for Coventry but jointly with Nuneaton and Bedworth and Rugby Borough Councils respectively. This is a prime example of on-going commitment to the DtC between neighbouring Councils, the County Council and Highways England. Further to highway improvements however, there will also be substantial development in the city's rail services supported by the Very Light Rail scheme which will link the Railway station to Poll Meadow bus station and other routes, including the University Hospital. Midlands Connect will also enhance connections between the West and East Midlands, including the creation of a direct link between Coventry and Leicester. Improvements in Coventry's cycle network will continue to be made, in Foleshill, at the University of Warwick and the creation of a segregated cycleway in the City Centre.

Water Supply and Sewerage Capacity

The Coventry Water Cycle Study (2024) identifies that there is capacity to support growth across Coventry, but the water environment and water services infrastructure cannot support all of the development in the proposed allocations until further investigations and upgrades have been completed. There are some areas such as the City Centre, where growth is largely unconstrained by the water environment but others, such as the SUE's, which have some level of constraint and will require on-going collaborative working between the Council, Environment Agency and Severn Trent Water to resolve.

Water Supply: Water resources used to supply drinking water to the North West of the city are under pressure, and whilst Severn Trent is able to undertake system improvements to augment resources and reduce leakage, managing demand remains a core part of the solution. Therefore, new build developments should conform to at least the basic levels of water efficiency. It is important that development is carefully phased to ensure the integrity of supply.

Waste Water and Sewerage: Overall there is sufficient capacity at existing wastewater and treatment facilities to accommodate growth provided locational phasing requirements are considered.

Flood Risk: Overall, there is capacity to accommodate growth and the risk of fluvial or watercourse flooding is either low, or can be mitigated. Although surface water flooding is widespread and would be present at many development sites, careful planning and implementation can mitigate the issues through the use of natural attenuation and infiltration methods. Sustainable Drainage Systems and the use of multipurpose green spaces will be a key element in supporting sustainable drainage and reducing the risk of flooding. Detailed flood risk assessments will be required to support planning applications where appropriate.

Utilities – Energy Supply

Energy supply covers infrastructure associated with the provision of electricity and gas. The infrastructure ranges from transmission and distribution networks to localised energy generation.

The energy providers who operate transmission and distribution within the city are Cadent and National Grid. Cadent is responsible for the provision of gas and National Grid is responsible for the provision of electricity.

Cadent have indicated that gas supplies will remain adequate for the level of growth set out in the plan. National Grid indicate that a number of enhancements will be required throughout the city to ensure a robust provision of electricity supply. Developers will need to engage with national Grid to ensure the timely provision and incorporation of such facilities to ensure appropriate and adequate power supply.

The Council will continue to liaise with Western Power to ensure future growth plans and the IDP is kept up to date. Of particular importance will be the provision of new sub-stations to support the larger development proposals. The Council is developing a Strategic Energy Partnership Masterplan 2024 which will support the achievement of net zero objectives and improve climate resilience

Examples include Friargate, the 2 SUE's, further growth at the University of Warwick and Whitley Business Park.

Health

NHS England and the Coventry and Warwickshire Integrated Care Board are responsible for the commissioning of health care services for the population of the city. Working in partnership with the Council, the NHS is identifying areas of the city that will require investment to support the proposed level of population growth. This is informed by the Coventry & Warwickshire Integrated Health and Care Delivery Plan 2023-2028 and is regularly updated to reflect changing needs and funding streams. This will ensure that all local people have adequate access to health care facilities in order to further support the public health agenda. Funding and investment may take two forms over the course of the plan period: the possible development of existing primary care premises that are suitable for expansion, and/or exploring options for new premises in areas of significant growth.

Current evidence suggests that the creation of new facilities may be required in the Keresley and Eastern Green areas to ensure enhanced service provision within these SUE's, whilst Foleshill has been identified as a priority area for the provision of a new primary care development for a number of years. Plans are on-going for the potential delivery of a new facility within Foleshill over the course of the plan period.

Evidence has also identified a need to look at existing services to the east of the city near to Walsgrave Hill Farm and in the west of the city at Allesley. This could take the form of expansion or re-configuration of existing built premises to make more efficient use of existing facilities. The preferred locations for new and existing facilities will be in defined centres which are easily accessible and can provide a sustainable and efficient facility linked to other local services. Where existing facilities are outside of designated centres but still serve a defined local community, their expansion and reconfiguration will continue to be supported subject to conforming to other policies in the Local Plan.

On-going work by NHS England and the Coventry and Warwickshire Integrated Care Board will identify the scale of expansion and final costs required to deliver these services. This will also help to inform any future infrastructure requirements to support mental health services and ambulance facilities across the city and surrounding area.

The City Council are also working very closely with colleagues at University Hospital Coventry and Warwickshire. The Local Plan is supportive in principle of expanding facilities at the hospital to help meet growing demand and land is available at the site of the hospital to facilitate this. The proposed secondary/blue light access and additional parking facilities will also be supported through development at Walsgrave Hill Farm and the remodelling of the A46 junction at Clifford Bridge.

Education

The local authority is responsible for ensuring there are sufficient pupil places throughout the city across all key stages. Where new development generates a direct need for new school places, the DfE anticipates that the Council will seek planning obligations, through Section 106.

Since 2008, the city has carried out expansions at over 30 of the city's primary schools, with over 7,000 primary places having been created. As at 2024, city wide primary place provision is considered adequate, although this fluctuates at a more local level: area by area and school by school there are some local shortfalls and some overprovision. This is expected to create some localised pressures as a result of new development. The creation of 'bulge' classes is being explored in order to meet surge demand at primary stage. Options may include the creation of three new classes per year until the end of the plan period. Forecasting predicts that further expansion on sites at Henley and Stoke park may be required to ensure the pupil pathway is robust. The growth of the city has also seen the increase in the numbers of pupils requiring Special Educational Needs (SEN) provision. The Council has a strategy of Enhanced Resource Provision (ERP), wherever possible, providing purpose built accommodation on existing sites. At present, forecasting suggests that three new ERP facilities will be required each year for the duration of the plan period.

Development proposals will require further secondary as well as primary places. The timing and progress of the developments are critical, remembering that schools need to be ready for the pupils in advance of them arriving.

The One Strategic Plan sets out the future options for the provision of school places in the city. Two key developments are Keresley and Eastern green SUEs.

- Keresley: 3,100 homes. This could comprise a new 2FE primary school (land and buildings) plus an extension to an existing local school.
- Eastern Green: 2,250 homes. At primary level, a new 3FE primary school will be required alongside additional capital funding to support the potential expansion of an existing primary school within the local area.

Other potential development sites are outlined in the IDP.

Communities

The demand and need for social, community and leisure facilities is likely to grow significantly over the course of the plan period. In order to achieve adequate

provision, new or expanded facilities will be required to meet the needs of the city's population. Where appropriate, new development will help to fund the expansion and improved quality of existing facilities within local communities, at the same time as having regards to the Council's most up to date Green Space Standards and Sports and Leisure Strategies. This will also help meet the needs generated by the residents and/or workforce associated with new development. Community services such as libraries and community centres will continue to be considered in the context of multi-agency service provision where possible. Future collaborative working with a range of partners including charitable trusts, the Council and voluntary organisations will be fundamental to ensure the continued provision of a range of community facilities and services.

The cultural strategy for the city is centred on the Council Plan objectives to bring the city centre to life and promote the city as a visitor destination and centre for arts and culture; sports and leisure; music and events. This strategy reflects key capital aspirations and an analysis of priorities to support growth in leisure tourism.

Sports and Green Space

There are numerous parks and open spaces across the city which will continue to be maintained by the Council and partner organisations including community groups who have a significant contribution to make in their local community. Funding for new or significantly enhanced parks and open spaces will be sought from a variety of sources, mainly; developer contributions, grant funding or lottery bids. Costing will be continually reviewed through the IDP.

The Coventry Playing Pitch and Outdoor Sports Strategy 2023 includes vision aims to provide a range of high quality sporting opportunities and to provide a range of modern, accessible and high quality sports facilities. A revised Indoor Sports Strategy is currently being developed and will be published in early 2025.

The Local Plan has identified two sites for replacement sports pitches which will be delivered to facilitate new developments at Whitley and Canley. In addition the regeneration of Whitmore Park will see the existing private sports pitches released and safeguarded for public use, whilst other developments in Eastern Green, Foleshill, Longford and Henley will help create new publicly accessible green spaces to the benefit of local communities.

The proposed SUE's are also expected to make significant contributions towards green infrastructure, especially along the existing brook corridors and around the ancient woodlands. Such quality based enhancements will also be realised through the new Heritage Park proposed around Charterhouse, the London Road Cemetery and the old Coventry loop line. In the future these areas are expected to become Local Green Space designations to reflect their status as new and improved infrastructure and support their importance to new communities within the city. In a similar context, the development at Cromwell Lane will also make provisions for a

new woodland feature along the western boundary, which will replicate Ancient Arden landscape principles.

Emergency Services

There are four Fire Stations and three Police Stations located within the urban area. Both services have a central presence within the city centre with satellite facilities to the southeast and northeast. This includes the city centre fire station at Abbotts Lane which has recently been redeveloped and enhanced. There is a fire station located in Canley to the southwest and a non-public facing police station. Initial evidence suggests fire station provision will be adequate to serve an increased population. On-going consultation will be required to identify longer term funding requirements to provide an adequate service. Contributions will therefore be sought from developers where appropriate. Consultation will continue with the Police Authority to identify specific sites and areas for service provision.

Waste

The predominant residual municipal waste treatment method within Coventry is Energy from Waste (EfW). The facility saw expansion and improvement in 2020. Therefore, the land identified for the expansion of this facility hase now been delivered as intended. On-going assessment of the needs and costs of both domestic and commercial refuse collection will continue to be assessed in detail to support the monitoring of the IDP. The supply of new domestic waste storage and disposal facilities will be required for all new properties and will be funded through a combination of council tax and, where viable, developer contributions.

City Centre Infrastructure

In recent years there has been significant investment in city centre public realm improvements which have complemented the substantial investments in job creation and urban regeneration. Likewise, more people are now living in the city centre following delivery of new homes over the last 10 years. Coventry University also continues to grow, not only in terms of its student numbers, but also its national and global reputation and the size and quality of its campus.

The Local Plan makes provisions for significant levels of new homes, office provision and leisure and tourism facilities. These generate specific needs in terms of supporting infrastructure, principally around highway and public transport improvements to support accessibility. The expansion of the railway station, enhanced routes and linkages throughout the city centre and further improvements to Ring Road junctions 1, 2, 4, 5 and 9 with enhanced crossing facilities at the Canal Basin and Whitefriars Street all contribute to meeting this challenge. They will also support further public realm improvements and new green and blue infrastructure, with specific focuses around Greyfriars Green and Swanswell Pool, along with opportunities explored to deculvert parts of the River Sherbourne.

Site Name Location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Utilities					
City wide	Development of new additional utility networks and enhancements to existing utility networks to enable net zero carbon, resource efficient, resilient and adaptable buildings and transport, with appropriate energy supply capacity for expected future demands (both current and new need), across the city. The Strategic Energy Partnership Energy Masterplan 2024 and subsequent updates may provide a reference point to support opportunities.	To support achievement of net zero objectives, improve climate resilience, optimise heating/cooling helping to manage costs	To be determined through procurement process and subsequent business plans	To be determined.	Local Plan Period
Air Quality					
Improvements to air quality across the city will be made in-line with the priorities set out in the Climate Change Strategy, the Local Transport					

Plan and the Local Air Quality Action Plan and will be delivered throughout the life of the Local Plan.					
Water and flooding					
City wide	General water supply.	Work with Severn Trent Water to ensure water supply to new developments is identified within their investment programme. This will ensure adequate provision is made for new developments. Updated Water Cycle Study 2024.	Developer, Severn Trent Water (STW) and Environment Agency (EA) if needed.	Presently unknown.	Local Plan Period
City wide	Waste water and sewage facilities.	Work with STW to ensure waste water and sewage can be adequately dealt with and is identified within their investment programme. This will ensure new developments are adequately managed and supported. Updated Water Cycle Study 2024.	Developer, Severn Trent Water and Environment Agency if needed.	Presently unknown.	Local Plan Period

City wide	Flood Prevention programme.	Prevent/mitigate potential issues in the future, and resolve existing issues. To ensure all homes, business and public spaces are free from flood risk. Updated Water Cycle Study 2024.	Developer, Severn Trent Water and Environment Agency. New strategic Flood Risk Assessment produced.	To resolve existing issues will cost approximately bet ween 4million and £5million.	Local Plan Period
Stoke Aldermoor	Upgrade to water supply provision and pipe network.	Improvement to overall water distribution, aided by the removal of Pressure Reducing Valve.	Funding sourced from both EA and STW.	Presently unknown.	Medium term (3-5 years).
City Centre - River Sherbourne	De-culverting the river, especially in the proximity of Fairfax Street.	To support the day lighting of the River Sherbourne within the city centre and promote environmental and economic benefits of this.	Developer contributions, UK Shared Prosperity Fund (UKSPF), Coventry City Council (CCC) and private investors.	Approximately £4 0,000 per metre	Across Plan Period
Broad Lane/Banner Lane; Canley	Flood alleviation measures.	Based on FCERM 6 year programme, review of recent flood events and the high-level identification of potential flood	Funding sourced exclusively from EA.	Presently unknown.	Short Term (1-2 years).

Brook; Upper Brookstray		storage locations in the updated SFRA. Essential to ensure that flood risk is not increased in areas where future development/growth is proposed.			
Lake View Park	Creation of targeted wetland area to promote environmental and flood alleviation improvements.	Promote environmental enhancements and support wider flood alleviation measures that creates wetlands and riverine restoration.	Funding sourced from both EA and Warwickshire Wildlife Trust (WWT).	£30,000.	Over plan period
Prior Deram Walk and the railway corridor, Canley	Regeneration of local park and green corridor to the south of the railway.	Enhanced quality of provision will help offset loss of lower quality green spaces to support regeneration projects.	Led by CCC with developer contributions and voluntary groups.	Presently unknown.	Medium Term (3-5 years).

Swanswell Pool and Volgograd Place	Extension of Swanswell Pool and refurbishment of Volgograd Place.	To promote high quality green and blue infrastructure in the city centre.	Charging through developer contributions. In addition to funding contributions from; UK Shared Prosperity Fund (UKSPF), CCC and private investors.	Presently unknown.	Local Plan Period
Sport and recreation					
North West Leisure Facility	Leisure Centre with potential swimming pool, sports hall and strategic sporting offer	North West housing growth	City Council, Public Leisure Operator	TBC	TBC
Football Hubs – Coundon Hall Park and War memorial Park 9v9 grass: NE – 0.5 match sessions	Consolidating match pitches and improving the quality of match pitches	Playing Pitch strategy. To address the shortfall of pitches.	City Council, Football Foundation, FA	TBC	TBC

City wide – 5 match sessions. <u>5v5 grass:</u> NE – 1 match session City wide – 5 match sessions					
3G facilities shortfalls: NW – 2 x 3G pitches SW – 0.5 x 3G pitches SE – 1 x 3G pitches	<u>NW</u> Cardinal Newman Woodlands Coundon Court <u>SW</u> Coventry University or alternative <u>SE</u> Caludon Castle Sports Centre	To meet shortfall	City Council, Football Foundation, FA, schools, clubs	Circa £1m per 3G	2023 onwards

Cricket Wickets shortfall of pitches SE – 24 sessions SW – 24 sessions	Sites to be identified as part of the playing pitch action plan	Playing Pitch Strategy	City Council, ECB	TBC	TBC
Rugby Union shortfall of pitches NE – 14.5 match sessions NW – 4.75 match sessions SE – 9.5 match sessions SW – 12.5 match sessions	Sites to be identified as part of the playing pitch action plan	Playing Pitch Strategy	City Council, RFU	TBC	TBC

City wide – 41.25 match sessions					
Transport					
Coventry Very Light Rail (CVLR) 'demonstration project'	Development of a short section of track between Coventry Railway Station and Pool Meadow Bus Station to allow CVLR vehicles to be tested in a live environment. This section will eventually form part of Route 1		City Region Sustainable Transport Settlement (CRSTS)	£25-£50m	2025/26
CVLR Route 1	A first CVLR route, connecting Coventry Railway Station to University Hospital		CRSTS/ Other sources TBC	£100m+	2027/28+
Further CVLR routes	Development of a further network of VLR Routes serving various key locations across the city		TBC	£100m+	2027/28+
Tile Hill Station improvements	Station improvements aimed at establishing Tile Hill as a transport interchange/Park & Ride site, serving the West side of the city		CRSTS, Partnership with Transport for West Midlands (TfWM)	<£10m	2025/26
New direct connections to East Midlands	Establishing a direct rail connection between Coventry, Leicester and Nottingham		Midlands Connect / Rail Network Enhancement Pipeline (RNEP)	£100m+	6-15 yrs

More frequent service to Leamington, Kenilworth and Nuneaton	Improvements, including at Coventry Station and some double tracking of the line between Coventry and Leamington, to enable an increased service of two trains per hour		Midlands Connect / RNEP	£100m+	2027/28+
Potential further new railway stations	Potential further new railway stations at Binley & Willenhall, Coundon, Coventry South and/or Foleshill. Further work is required to determine whether some, or all, of these stations would be viable		RNEP, Partnership with TfWM / West Midlands Rail Executive (WMRE)	TBC depending on how many of the 4 potential sites are considered viable	2027/28+
Bus Service Improvement Plan (BSIP)	Delivery of plans set out in TfWM's BSIP, including freezing fares, expanding the use of contactless payments, ensuring tickets can be used across different operators and expanding the use of real time information at bus stops		BSIP, TFWM	£50-100m (WMCA full area)	3 yrs

All Electric Bus City	All buses operating in the city to be replaced with electric buses		DfT - All Electric Bus City grant (£50m)/ Bus operator contributions, TFWM	> 100m	2025/26
Ansty Park & Ride	Establishing an, initially bus-based, park and ride service at Ansty as part of the Coventry and Warwickshire CLEAN Hub project (with the potential to add a CVLR service at a later date)		Partnership with Warwickshire County Council (WCC) / Rugby Borough Council (RBC)	£50-100m	2027/28+
City Centre Traffic Management Plan	Introduction of further restrictions on car travel within the Ring Road, with the aim of ensuring that the whole city centre is designed primarily as a pedestrian friendly environment		CRSTS	<£10m	2024/25
Further city centre public realm improvements	Ongoing programme of further public realm improvements in the city centre		TBC – potential for developer contributions	Ongoing programme	Ongoing programme
Local centre improvements	Ongoing programme of improvements to various local centres around the city, including public realm improvements and better walking, cycling and public transport connectivity		TBC – potential for CRSTS and developer contributions	Ongoing programme	From 2025/26

Ring Road Junction Remodelling	Remodelling of various Ring Road junctions	To remove congestion & improve pedestrian & cycle access in and out of the city centre	Programme/ Developer contributions	£25-£50m	2027/28+
Coundon and Binley cycleways	Completion of two fully segregated cycleways, connecting the city centre to Coundon and Binley		Coundon – Local Air Quality Action Plan (LAQAP) Binley - Transforming Cities Fund (TCF)/ Active Travel Fund (ATF)	<£10m each	2024/25
City Centre Cycleway,	New segregated cycleway between Queen Victoria Road and Pool Meadow Bus Stations		ATF	<£10m	2024/25
University of Warwick cycle routes	Improved cycle connections between the University of Warwick and neighbouring residential areas, railways stations and the city centre		ATF/ Developer contributions/ Sustrans	<£10m	2024/25
Foleshill Transport Package	The package includes segregated cycle facilities on Foleshill Road, as well as junction improvements on the A444 (to accommodate	Package of improvements to reduce the level of through traffic on Foleshill Road and encourage greater levels of active travel.	CRSTS	<£10m	2025/26

	traffic displaced from Foleshill Road)				
Coventry South/ London Road Transport Package	Various improvements on the A444 and London Road corridors, including improvements to signage to reroute through traffic, remodelling of key junctions and the installation of segregated facilities for cyclists		CRSTS/ Developer contributions	£10-£25m	2026/27
Eastern Green cycleways	Two new cycleways connecting the planned Sustainable Urban Extension (SUE) at Eastern Green to the city centre and to Tile Hill Railway Station		Developer contributions	<£10m	2026/27
Keresley Connects cycleways	New cycleways connecting the planned SUE in Keresley to the city centre, Allesley/ Lyons Park and the existing Coundon Cycleway		Developer contributions	<£10m	2025/26
Further cycle network improvements	Ongoing programme to develop and deliver further cycleways, informed by the LCWIP.		ATF/ Developer contributions	Ongoing programme	From 2025/26

Liveable Neighbourhoods trials	Development of two initial Liveable Neighbourhoods, in collaboration with local residents		ATF	<£10m	2025/26
Further programme of Liveable Neighbourhoods	Ongoing, community-led programme to establish further Liveable Neighbourhoods		TBC	Ongoing programme	From 2025/26
WM Cycle Hire	Ongoing expansion of the existing WM Cycle Hire scheme, with the aim of covering the whole city		TfWM	Ongoing programme	1-15 yrs
E-scooter rental scheme	Expansion and roll-out of the existing pilot scheme. Further actions dependent on national changes to legislation expected in 2023/24 subject to parliamentary timetable		TfWM	TBC	1-15 yrs
A46 Stoneleigh Junction improvements	Complete upgrades to the A46 Stoneleigh Junction (currently underway)		WCC	£25-50m	2024/25
LAQAP highways schemes	Complete various highway improvement schemes aimed at reducing air pollution at several pinch points, including Spon End, Ring Road Junction 7 and the			£25-50m	2024/25

	Holyhead Road area (currently underway)				
Keresley Link Road	A new connection through the planned Keresley SUE, linking Long Lane in the West of Coventry and Winding House Lane in the North. This will also remove through traffic from existing residential areas in NW Coventry			£10-£25m	2025/26
A46 Walsgrave Junction improvements	Planned junction upgrade to improve journey times on a key strategic route		National Highways	£50-£100m	2027/28+
A46 Strategic Link Road	A new strategic link between the A46 South of Coventry (at Stoneleigh Junction) and either Solihull or the West of Coventry.	This would create a new travel corridor linking the North Warwickshire/South Coventry with UK Central Plus (including the new HS2 station) in Solihull	Partnership with WCC and Solihull Metropolitan Borough Council (SMBC)	£100m+	2027/28+
M6 Junction 3 improvements	Improvements to reduce congestion at a key junction		National Highways	£25-£50m	2027/28+

Highway maintenance programmes	Ongoing programme of work to maintain our highways, cycleways and footways according to identified prioritisation based on condition and other factors		CRSTS	Ongoing programme	Ongoing programme
Road safety programmes	Annual programme of road safety improvement schemes based on casualty reduction priorities		CRSTS	Ongoing programme	Ongoing programme
Average speed cameras	Ongoing programme to reduce vehicle speeds within the city.	Rolling out average speed camera enforcement, with the aim of installing these on all major radial routes into and out of the city according to a prioritised programme	CRSTS	Ongoing programme	Ongoing programme
5G monitoring/ Connected Autonomous Vehicles (CAV) Testbed	Various projects aimed at preparing our highway network for the future	Includes testing of CAVs and the rollout of 5G monitoring and other projects involving trialling and rollout of new transport technology	TfWM/ Commercial/ Government research funding e.g. Innovate UK	Ongoing programme	Ongoing programme
Local EV charging hubs	Programme of EV charging/ multi-modal transport hubs in various locations around the city		Ongoing programme		From 2024/25

Coventry and Warwickshire CLEAN Hub	Creation of a multi-modal transport interchange initially with electric vehicle charging facilities and park and ride services, with further features to be added later		£50-100m	Partnership with the private sector	2027/28+
Trial of dynamic charging of electric vehicles	Development of “wireless” charging allowing EVs to be charged on the move.		<£10m	Partnership with the private sector	2027/28+
Green Innovation Park	Creation of a ‘super charging hub’ for electric vehicles		£10-£25m	OZEV	2027/28+
Public electric vehicle charge points network expansion	Ongoing programme to expand the city’s network of public electric vehicle charge points		Ongoing programme	National Highways / CCC	Ongoing programme
Expansion of car clubs/ car sharing services	Ongoing work with commercial partners to expand the provision of car clubs/ car sharing in the		Ongoing programme		1-15 yrs

	city, and encourage the provision of more shared electric vehicles				
Project Skyway	Investigation of the potential for drones to undertake longer distance deliveries along pre-determined corridors		£50-100m	Partnership with WCC	2-3 yrs
Ansty freight consolidation centre	Establishing a freight consolidation centre in Ansty as part of the Coventry and Warwickshire CLEAN Hub project		TBC	Partnership with TfWM and private sector	2027/28+
Education					
Lyng Hall	4 classroom block, dining area expansion to provide increased internal dining and extension of sports hall.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£2,000,000	Completed in 2023
Stoke Park	Refurbishment classrooms and changing rooms. External landscaping and pitch enhancement.	Due to rising demand for school places and within the One strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£1,000,000	Completed in 2023

Bishop Ullathorne	Provision of New Sports Hall on school site	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£3,000,000	Completed in 2023
Finham 2	Refurbish Edwards Keep to form new classrooms and changing facilities, update the current DT Workshop into a new food technology space, refurbish the existing science classroom in to a STEM classroom and expand the sports facilities to create a new Muga that has previous planning approval.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£2,000,000	Completed in 2023
Westwood	Temporary accommodation for September 2021: changing space (split for girls and boys) and 2 x general teaching classrooms Refurbishment of existing DT classroom (complete) (to create 2 x general teaching classrooms), refurbishment of existing Art classroom (to create 2 x general teaching classrooms) September	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£1,000,000	Completed in 2023

	2023 permanent changing space (new standalone block)."				
Baginton (Rebuild)	A potential project to rebuild and expand Baginton Special School to accommodate additional pupils.	To meet the needs of children with Special Educational Needs or Disabilities. Provisions forms part of school management programme to make more efficient use of resources and better deliver services.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	Completed by 2027
Woodlands	SEMH Woodfield's schools currently across 2 sites with buildings that have been deemed unsuitable for purpose in the long-term. There is an opportunity to use the site formally occupied by Woodlands School. This site contains listed buildings and successfully provides community sports use. The project is to enable the integration of the Primary and Secondary schools onto one site and continue to provide the community sport provision. It is proposed to dispose of the Primary and Secondary site for	To meet the needs of children with Special Educational Needs or Disabilities. Provisions forms part of school management programme to make more efficient use of resources and better deliver services.	Charging through Section 106 agreements, and funding from DfE.	To be finalized with contractor undertaking work	Completed by 2024

	development to provide funding for the main scheme."				
Cardinal Wiseman	"3 modular classrooms and extension of existing classroom to create science room (external extension with internal refurbishment). The school may wish to extend across the full width of the building and will be provided prices to confirm if they wish to proceed at their costs.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£1,000,000	Completed in 2023
Blue Coat	Initial discussions with school indicate that the works will comprise the following element - Provision of new single story sixth form block (6 classrooms) for September 2023	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£2,000,000	Completed by 2023
Keresley SUE New School	Due to new housing in the local area, land has been secured for a 2FE Primary School	Due to rising demand for school places due to housing in the local area and within the One Strategic Plan for Education, an new school building will be created on site.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	Completed by 2027

Eastern Green New School	Due to new housing in the local area, land has been secured for a 3FE Primary School	Due to rising demand for school places due to housing in the local area and within the One Strategic Plan for Education, an new school building will be created on site.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	Completed by 2030
ERP	Extensions to existing primary schools to provide additional resources and facilities for Special Needs Pupils (SEN)	The number of special needs pupil is on the rise and extending existing primary schools to include Enhanced Resource Provision (ERP). These resources will provide an adaptive classroom, sensory areas, and spaces for development. This will ensure a supportive learning environment tailored to the diverse needs for pupils with special needs. It brings about inclusivity for the pupils.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	3x per year till end of plan period
Primary Bulge Class	Temporary expansion of school facilities. This is for a single year, in which for example Year 3 increase, and that increase then moves through the school until that cohort reaches Year 6.	The recent increase in demand of school places across the city because of in-year migration has had the most substantial impact on the availability of places in all year groups. The consequence of this increased demand is that it has significantly reduced the number of school places	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	3x per year till end of plan period

		available in Coventry primary schools. Hence the need for bulge classes to address this issue.			
Foxford	Construction of four permanent classroom	Additional capacity in the model of both permanent and temporary expansions are being added in secondary schools to ensure sufficiency of places, viability for schools, and cost efficiency. This is to provide for the larger birth cohorts identified through the pupil forecasts. Foxford school is part of the expansion programme to deliver additional places.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	To be completed by 2024
Castle Wood	Refurbishment of office space to create two classroom spaces and construction of office spaces.	The yearly increase in demand for Education Health & Care Plans has increased placing pressure on the specialist system. Since the introduction of the Children and Families Act which was enacted in September 2015, demand for EHC Plans has grown both nationally and locally. Consequently, demand for special school placements has increased excessively thereby exceeding forecasts	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	To be completed by 2025

		based on birth rates. So as to ensure that children with EHCP receive the right support expansion of specialist schools are in delivered in phases. Castlewood is one of those schools.			
Corley Centre	Creation of additional learning spaces	The yearly increase in demand for EHC Plans has increased placing pressure on the specialist system. Since the introduction of the Children and Families Act which was enacted in September 2015, demand for EHC Plans has grown both nationally and locally. Consequently, demand for special school placements has increased excessively thereby exceeding forecasts based on birth rates. So as to ensure that children with EHCP receive the right support expansion of specialist schools are in delivered in phases. Corley Centre is one of those schools.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	To be completed by 2024

Henley College Site	Refurbishment or rebuild of former college site	Rebuilding or refurbishment of the site to create additional secondary school places due to the larger birth cohorts identified through the pupil forecasts and the high number of primary pupils leaving year 6 into Year 7. This project work is required to ensure there is sufficient places for pupils.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	To be completed by 2027
Stoke Park	Expansion of the school facilities	Additional capacity in the model of both permanent and temporary expansions are being added in secondary schools to ensure sufficiency of places, viability for schools, and cost efficiency. This is to provide for the larger birth cohorts identified through the pupil forecasts (highest birth cohort currently in Year 7). Stoke Park school is part of the expansion programme to deliver additional places.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	To be completed by 2026
Lyng Hall	Creation of a new sports hall	The school will be increasing its pupil numbers due to demand on school places around the city. The current sports hall provision at the school is not of a suitable size or standard to	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	To be completed by 2025

		accommodate the additional pupils.			
Health Infrastructure					
New/expanded health facilities to be provided to support population growth in accordance with the Integrated Care System Infrastructure Strategy.	In line with the NHS England Integrated Care System Infrastructure Strategy.	To support the provision of facilities and services in line with the Integrated Care System Infrastructure Strategy.	Charging Section 106 agreements and Section 278 agreements. Funding from the NHS and Integrated Care Boards.	Cost to be determined as scheme specific details emerge.	TBC
New health facilities to support Keresley SUE	New/expanded health facilities.	To provide appropriate services support the needs of a new community.	Charging Section 106 agreements and Section 278 agreements. Funding from the NHS and Integrated Care Board	Cost to be determined as scheme specific details emerge.	TBC

New health facilities to support Eastern Green SUE	New/expanded health facilities.	To provide appropriate services support the needs of a new community.	Charging Section 106 agreements and Section 278 agreements. Funding from the NHS and Integrated Care Board	Cost to be determined as scheme specific details emerge.	TBC
Ongoing provision of services at UHCW	New/expanded health facilities.	To ensure accessibility to high quality health care facilities for both present residents of Coventry and those that will reside in new developments.	Charging through Section 106 agreements and Section 278 agreements. Funding from the NHS and ICB.	Cost to be determined as scheme specific details emerge.	Across Development Plan Period
Cross Boundary Infrastructure					
Through the Duty to Cooperate the City Council is working with its Warwickshire neighbours to identify key cross boundary infrastructure in Warwickshire that has a close or direct relationship with Coventry and the delivery or facilitation of its wider housing and employment needs.					

Appendix 8 - Monitoring Framework

Monitoring

The Council will produce and publish an Annual Monitoring Report containing information on the implementation of the Local Development Scheme and on the extent to which policies set out in the Local Plan are performing.

The table below shows a set of indicators and targets related to the policies of the Local Plan. Further development plan documents will contain their own indicators and targets and the results will be brought together in the Annual Monitoring Report.

The Monitoring Framework has been appended to the Local Plan to reflect the fact that it is a 'living document'. Many of the Local Plan policies will require assessment over time to understand appropriate trends and impacts on development. This reflects the changing face of planning policy in recent years and the increasing need to consider the impacts of climate change and sustainable development. Where trends become apparent through monitoring this Framework will be updated through the Annual Monitoring Report process.

Indicators and Targets

Policy	Indicator	Target
DS1	To monitor and record the completion of new homes and new employment land within the city's administrative boundary.	At least 29,100 homes delivered over the plan period (1455 p.a.) 60 ha employment land delivered over the plan period
	Support neighbouring authorities through the Duty to Cooperate to monitor the annual delivery and supply of new homes and employment across the Housing Market Area as a whole.	To support the monitoring of housing and employment requirements across the HMA and FEMA
DS2	Monitoring of Duty to Co-operate and partnership working to deliver growth	Actions delivered in partnership to deliver strategic priorities

DS3	Monitoring of sustainable development	Delivery of policy in accordance with policies in this plan relating to climate change, housing, economy, environment, health, transport, heritage, waste and energy.
DS4 (A-D)	To monitor the site-specific triggers associated with Parts B-D of this policy.	Development progress to be monitored on a rolling basis with the continuation of development and occupation linked to the relevant triggers.
HW1	Number of applications supported by completed HIA's each year.	Submitted HIAs successfully reviewed by Public Health offices to inform decision making outcomes
JE1	Monitor and record the supply and delivery of employment land as set out in DS1, broken down by use class Class B2, B8 and E (g). To be recorded as Ha of land and sq.m of floor space. Monitor and record the level of vacant employment premises within the city's administrative boundary. This should be recorded by sq.m of floor space and by use class.	Monitor performance of policy against targets set out in DS1
JE2	Monitor and record the supply and delivery of employment land allocations. Sites to be assessed against delivery of land (in Ha) and floor space (in sq.m).	Annual reporting to identify the delivery progress of respective allocations.
JE3	Monitor and record the loss of employment land (by use class) to alternative uses. To be recorded as Ha of land and sq.m of floor space. As part of this monitor the loss of office premises to residential as part of permitted development rights.	To ensure local evidence remains up to date in terms of understanding market conditions
JE4	Disaggregate the information collected for Policy JE1 and monitor and record the supply and delivery of office development. Identify the proportion which is delivered within a defined	Target to reflect the annual review of delivery of new offices at Friargate (in line with JE2). All new offices to be delivered within a defined

	centre and that which is outside. Monitor and record the proportion of new office development classed as Grade A.	centre.
JE5	Monitor and record the supply and delivery of Industrial and Storage/Distribution.	To be monitored as part of DS1, JE1 and JE2.
JE6	Monitor the supply and delivery of Tourism/Visitor Related Development.	To be monitored as part of DS1, JE1 and JE2.
JE7	Monitor how planning applications for employment are ensuring opportunities for local residents.	S106 agreements signed in accordance with JE7
JE8	Monitor and record the supply and delivery of Research and Development (R&D)	To be monitored as part of DS1, JE1 and JE2.
H1	Monitor and record the number of net housing completions per annum	In line with DS1
	Monitor and record the proportion of net annual completions which are categorised as either 'brownfield' or 'greenfield'.	With the exception of already allocated sites monitoring should clearly indicate successful application of the brownfield first presumption.
H2	Monitor the supply and delivery of allocated sites	Annual reporting to identify the delivery progress of respective allocations.
H3	Monitor the supply and delivery of new homes that: • Comply with NDSS • Meet M4(2) Adaptable and Accessible Dwellings	100% of new homes.
	Monitor the number of homes that meet M4(3) Wheelchair User Dwellings Adaptable and Accessible - of Building Regulation standards for access	10% of all new dwellings
	Monitor the number of dwellings located to meet Natural England's Accessible Natural Greenspace Standards (ANGST) doorstep standards or future equivalent, and where not possible the developer contributions received for local projects	To understand the effectiveness of the policy and measure trends. Aim to achieve 100% policy compliance with Policy part 1e

	Monitor and record the completed number of custom and self-build homes and community-led housing schemes.	For the custom and self-build returns and to understand demand.

H4	Monitor and record the supply, delivery, size (number of bedrooms), type and tenure of new homes.	Achieve the mix across the Coventry administrative area as set out in the HEDNA
H5	Monitor schemes which aim to improve, retrofit and regenerate existing stock	Number of successfully completed regeneration schemes approved.
H6	Monitor and record the supply, delivery and type of new affordable homes.	In line with HEDNA target: 941 pa Social Affordable rented and 149 Affordable Home Ownership
	Monitor the number of relevant applications each year that contribute the full affordable housing contribution requirements.	100% of relevant schemes.
H7	Monitor and record the supply, delivery and type of Gypsy and Traveller Pitches (both temporary and permanent).	The completion of 6 additional pitches over the plan period (in addition to the redevelopment of Siskin Drive). Number of transit sites and / or stop-over places delivered in line with evidenced need
H8	Monitor and record the supply and completion of Specialist Housing including specialist housing with elements of Care, Older Persons accommodation and hostels including reference to its type and size (number of bed spaces).	Maintain an appropriate supply of sites (as identified within the overall supply position as part of Policy H1 and H2) suitable to accommodate and deliver specialist accommodation in accordance with Policy H8 and the most up to date HEDNA
H9	Monitor and record the density of new development.	Greenfield sites – 35 dwellings per hectare (net) Brownfield sites 45 dwellings per hectare (net) Sites within the City Centre Transition Zone 125 dwellings per hectare (net) Development within the defined City Centre boundary 250 dwellings per hectare (net)

H10	Monitor and record both the supply and completion of new student accommodation (by conversion and new build), including reference to its type and size (number of bed spaces).	Maintain an appropriate supply of sites suitable to accommodate and deliver new student accommodation in accordance with Policy H10, and up to date evidence regarding the student market.

H11	See separate HMO DPD	See HMO DPD
H12	Build to Rent	Maintain an appropriate supply of sites (as identified within the overall supply position as part of Policy H1 and H2)
H13	Co-living	Number of co-living developments delivered in accordance with policy
R1	Monitor the supply and completion of allocated sites as illustrated in Policy R1 of the Local Plan.	Annual reporting to identify the delivery progress of respective allocations.
R2	Monitor the wider development strategy	Strategy being delivered in accordance with the policy
R3	For each identified centre, monitor and record the occupancy levels (by use class) and levels of vacancy.	100% occupancy with appropriate town centre uses
R4	To disaggregate the information for Policy R1 and record the supply and delivery of new town centre uses (by use class) which is categorised as: • outside of defined centres; • as edge of centre; • within a defined centre.	No town centre uses delivered within out of centre locations. Where this target is not met – add explanation and justification to support performance understanding including exceptional circumstances
R5	Shop fronts improved in line with the Design Guidance for Shopfronts SPD	100% compliance with the SPD for shop fronts requiring planning consent
R6	Monitor the supply and delivery of new restaurant, bars and hot foot takeaway premises.	100% of uses to be in defined centres

CO1	Monitor and record the net supply and completion of new social, leisure and community uses both within and outside designated centres. To be recorded by use class and by Ha of land and sq.m of floor space (as appropriate).	To be monitored through annual trends.
CO2	Monitor and record the net loss of social, leisure and community premises to alternative uses. To be recorded by use class and by Ha of land and sq.m of floor space (as appropriate).	To be monitored through annual trends.
CO3	Monitor progress on neighbourhood plans	Where neighbourhood plans are produced, they should meet the Basic Conditions so they can be made (ie adopted)

GB1	Monitor any changes to Green Belt	No inappropriate development in Green Belt
GB2	Monitor any changes to Safeguarded land	No inappropriate development on safeguarded sites
GB3	Monitor any changes to Local Green Space	No inappropriate development on Local Green Space
GE1	Monitor the delivery of new appropriate green infrastructure against the relevant requirements in the most up to date Green Space Strategy.	To be monitored through the Green Space Strategy.
GE2	In line with the monitoring of development completions identify the proportion that is completed on greenfield sites.	To be monitored through annual trends.
GE3	Monitor the number of sites in positive conservation management.	To be monitored through annual trends including information relating to Biodiversity Net Gain and the Local Nature Recovery Strategy.
GE4	Monitor the number of new TPOs issued.	To be monitored through trees data.
	Monitor the net loss of protected trees.	To target no net loss.
DE1	To ensure delivery of high quality design	100% of developments to comply with design codes in areas where these are in force.
DE2	To ensure delivery of high quality design	100% of developments to comply with design codes in

		areas where these are in force.
HE1	To monitor existing and proposed conservation areas	All conservation areas to have appraisals and management plans in place.
HE2	To establish a declining trend of sites at risk and show an improvement in status of those remaining on the list.	To establish a declining trend of sites at risk and show an improvement in status of those remaining on the list.
HE3	To adopt a masterplan for the Heritage Park concept and monitor its development and completion.	Approved Masterplan and then rolling annual monitoring to assess the progress of the proposals.
HE4	To ensure the policy is successfully ensuring archaeology is taken into account where appropriate	Number of applications where policy has been successfully applied
AC1 - AC3	Monitor and record the impacts and mitigation measures of approved transport assessments on an annual basis. This should allow updates of the IDP and inform investment priorities through developer contributions.	To update the IDP annually to reflect approved highway mitigation measures and record funding and delivery proposals. To regularly run a review of the strategic highway model at least every 5 years to review highway operation and reflect the most recent developments and mitigation measures.
AC1	To update the Coventry Connected SPD.	To be updated in 2025
AC2	Monitor the delivery of highway initiatives identified within the IDP including: new highway, junction improvements, Rapid Transit Corridors and Cycle Network.	To be monitored on an annual basis against the delivery of the IDP and schemes associated with site allocations.
	Monitor the proportion of trips undertaken by single occupancy car use.	Decreasing trend over the plan period

AC3	Monitor the number of applications approved that: 1/ meet the parking standards identified within Appendix 6 of the Local Plan. 2/ are supported by approved travel plans (where appropriate).	100% of applications as appropriate.
AC4	Monitoring of active transport schemes as set out in policy	Delivery of schemes set out in the IDP
AC5	To monitor bus patronage and its % of modal share. Delivery of new Rapid Transit infrastructure to be monitored through Policy AC2.	Increasing levels of patronage - evidenced from transport data
AC6	To monitor rail patronage and footfall through Coventry stations.	Increasing levels of patronage - evidenced from transport data
AC7	Monitor improvements in provision for freight including overnight services for 24hr operations and the development of consolidation centres	To be monitored through planning consents issued in line with policy on a tends basis
EM1	To ensure that developments are planning to be able to adapt to climate change and progress towards net zero carbon dioxide emissions city wide.	Net zero
EM2 / EM3	Policies from the 2017 local plan deleted	Deleted
EM4	Monitor the number of homes and amount of employment land completed where built development is located within flood zones	No development in Zone 3b
EM5	Monitor the number of completed SUDs schemes brought forwards either as part of new development or introduced retrospectively to support existing areas.	To be monitored on a trend basis year on year.
EM6	Ensure no development within a groundwater Source Protection Ground 1	No development within a groundwater Source Protection Ground 1
EM7	To monitor background and peak levels of air quality on a biannual basis.	To achieve an improving trend with a view to removing parts of the city from the AQMA status (where appropriate).

EM8	Monitor the amount of waste recycled in line with the Councils Waste Strategy targets	Accord with the Council's waste strategy
EM9	Monitor to ensure safeguarding policy is applied	Monitor trends – applications refused on the basis of this policy
EM10	Monitor the amount of non-mineral based development that takes place within the defined MSA's. This should be presented as a proportion of completed homes, employment land and other floor space	To be monitored for record - no target set.
EM11	Average annual CO2 emissions of new build development (split into regulated and unregulated) and %TER reduction for the regulated portion Percentage of new build residential units in the city with an installed heat pump	Annual decrease Annual increase
EM12	Average annual CO2 emissions of new build development (split into regulated and unregulated) and %TER reduction for the regulated portion Proportion of qualifying developments meeting BREEAM New Construction standards	Annual decrease 100%
EM13	Percentage of new build developments demonstrating active solutions in reducing overheating in new buildings	100%
EM14	Percentage of qualifying new build developments demonstrating embodied carbon assessments	Annual increase
EM15	Applications refused on the grounds of inadequate noise mitigation	100%
C1	Policy deleted	
C2	Policy deleted	
CC1	Monitoring of policy compliant City Centre Development	Delivery of development in accordance with City Centre policies in this plan, relating to overall development strategy, Green and Blue Infrastructure, Drainage and Flood Risk, Environmental Management and development responsive to the identified character areas of within the City Centre.

IM1	Monitor the number of applications each year that secure planning obligations. To monitor the amount of secured financial contribution to infrastructure year on year. To monitor the amount of money spent on new infrastructure schemes year on year. To monitor the receipt of developer contributions against the delivery of infrastructure provisions within the IDP.	To be monitored on a trend basis year on year and show the successful delivery of infrastructure schemes related to site allocations etc.

Appendix 9 – Designations & Allocations Maps

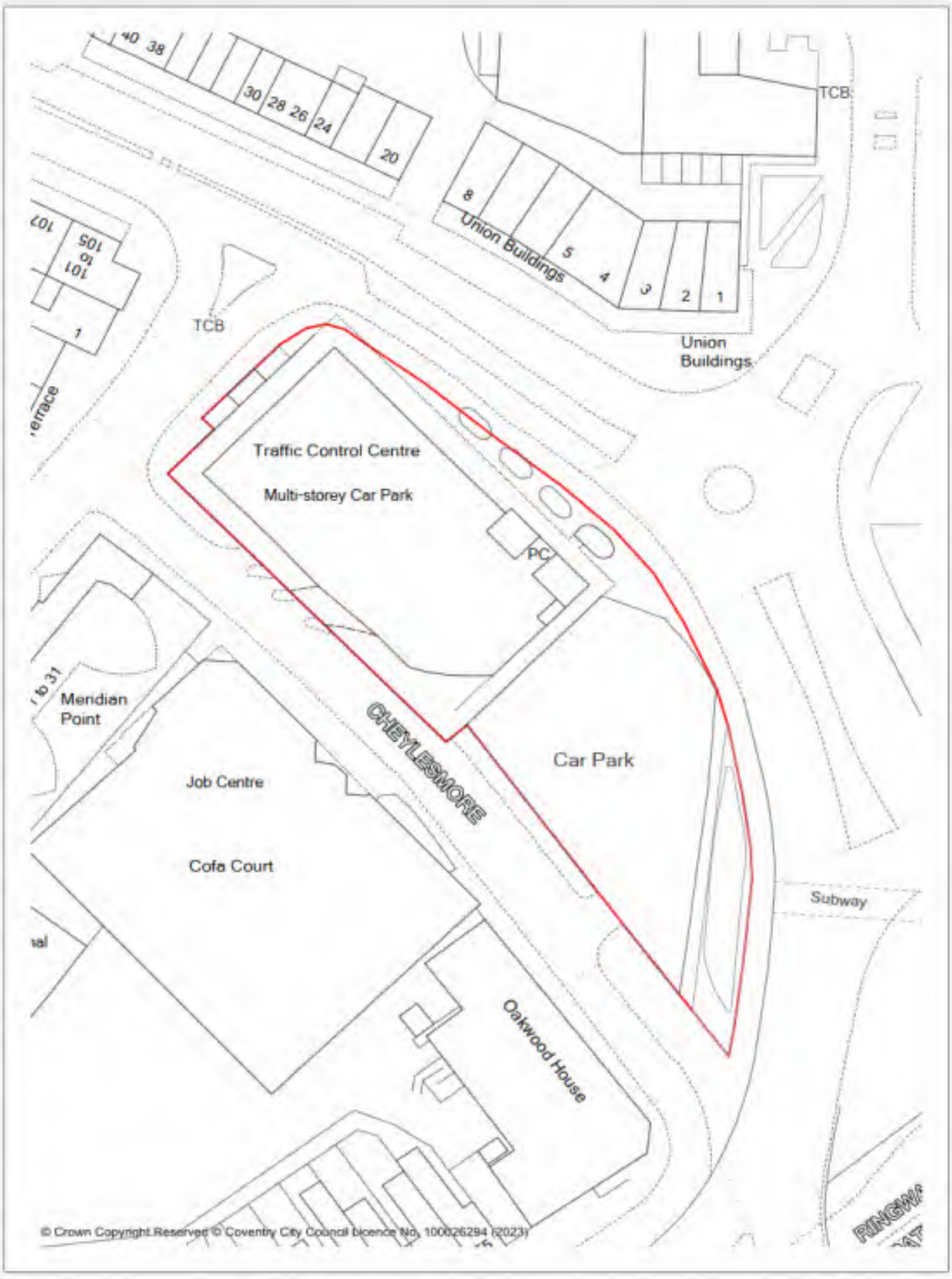
Appendix 9a: Key Employment Sites

Appendix 9b: New/Amended Housing and Mixed Use Allocations

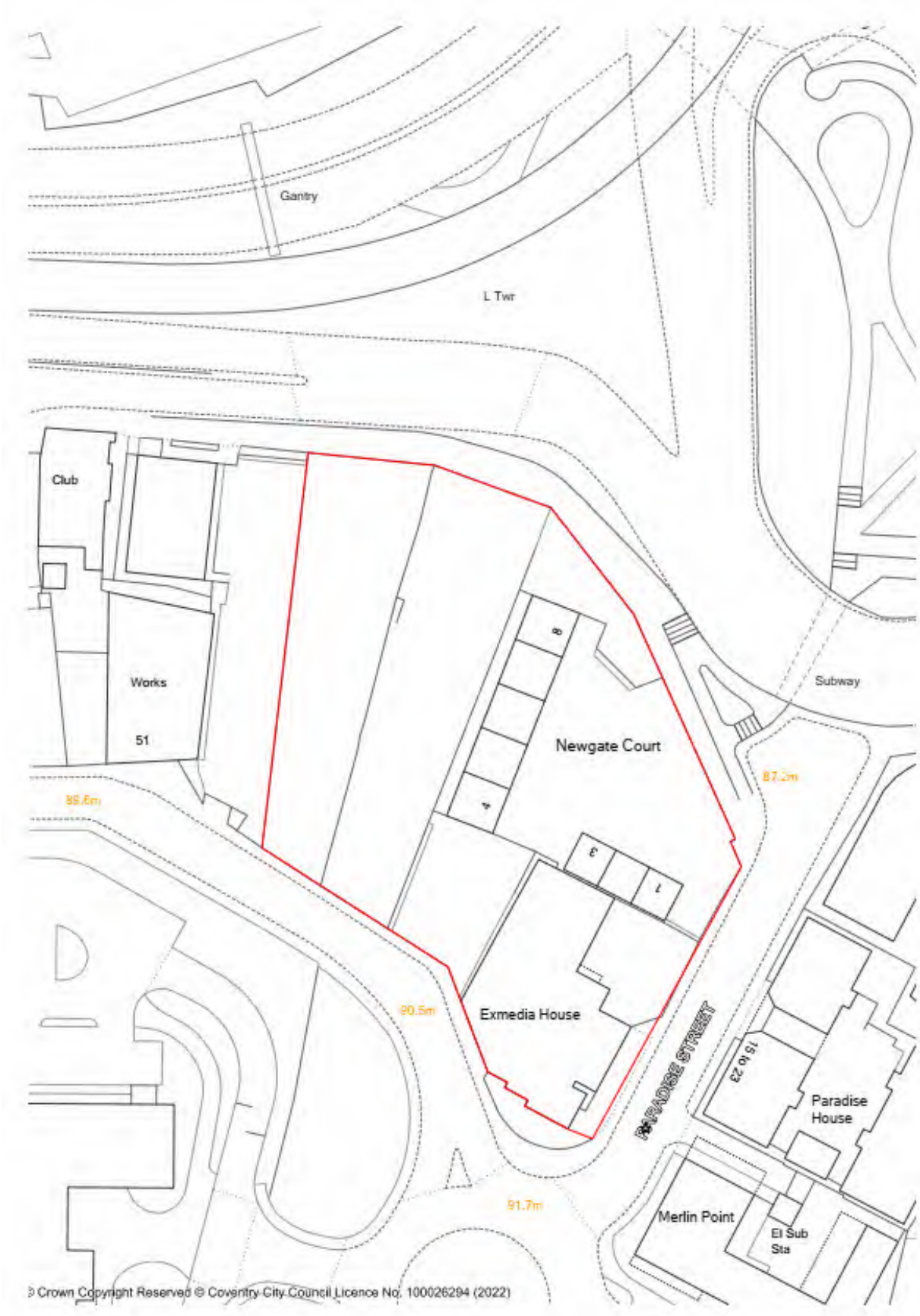
Housing Allocation H2:15 Sandy Lane (as amended)

Housing Allocation H2:26: Coventry Central Police Station

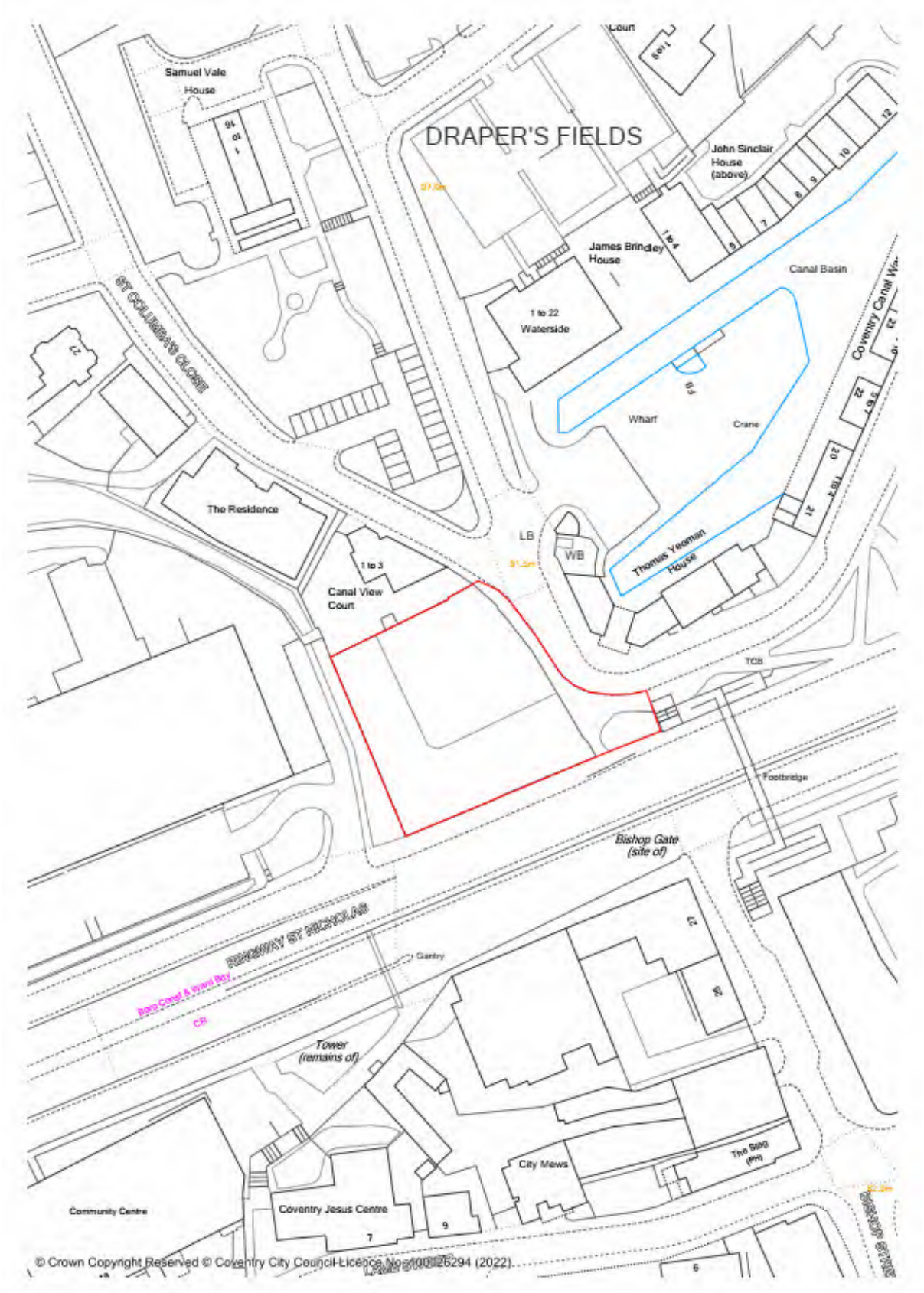
Housing Allocation H2:27: New Union Street Car Park



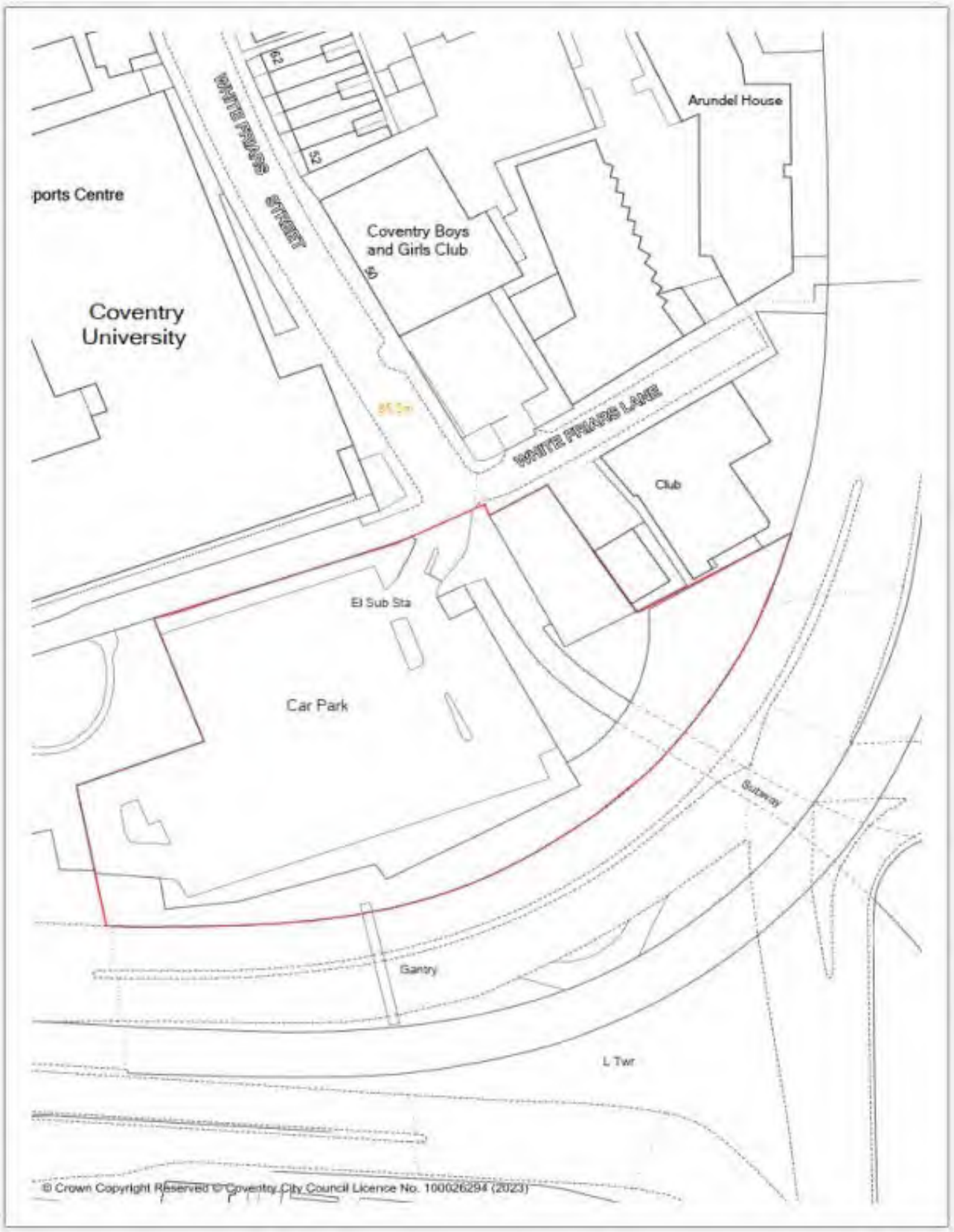
Housing Allocation H2:28: New Gate Court Business Park



Housing Allocation H2:29: Former Vintage House, St Nicholas Street



Housing Allocation H2:30: Whitefriars Street Car Park



Housing Allocation H2:31: Paybody Building, Stoney Stanton Road

Housing Allocation H2:32: Dale Buildings, Tower Street

Housing Allocation H2:33: Allesley Hotel, Birmingham Road

Housing Allocation H2:34: Former Chace School, Chace Avenue

Housing Allocation H2:35: Former School Site, New Century Park – Land to the South of Isadora Lea

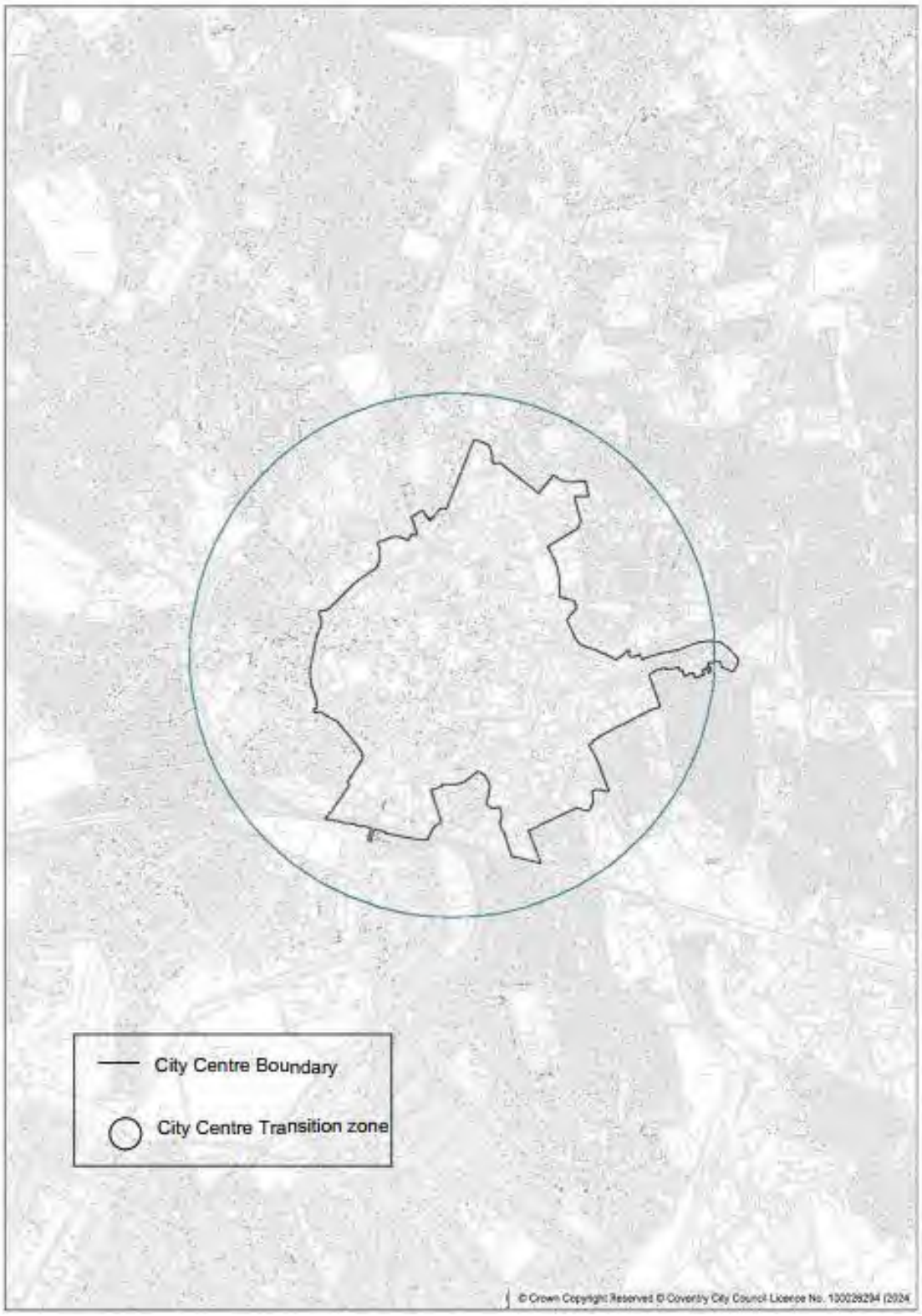
Housing Allocation H2:36: Land at Spon End

Mixed use Allocation H2:37: City Centre South

Mixed Use Allocation H2:38: Friargate

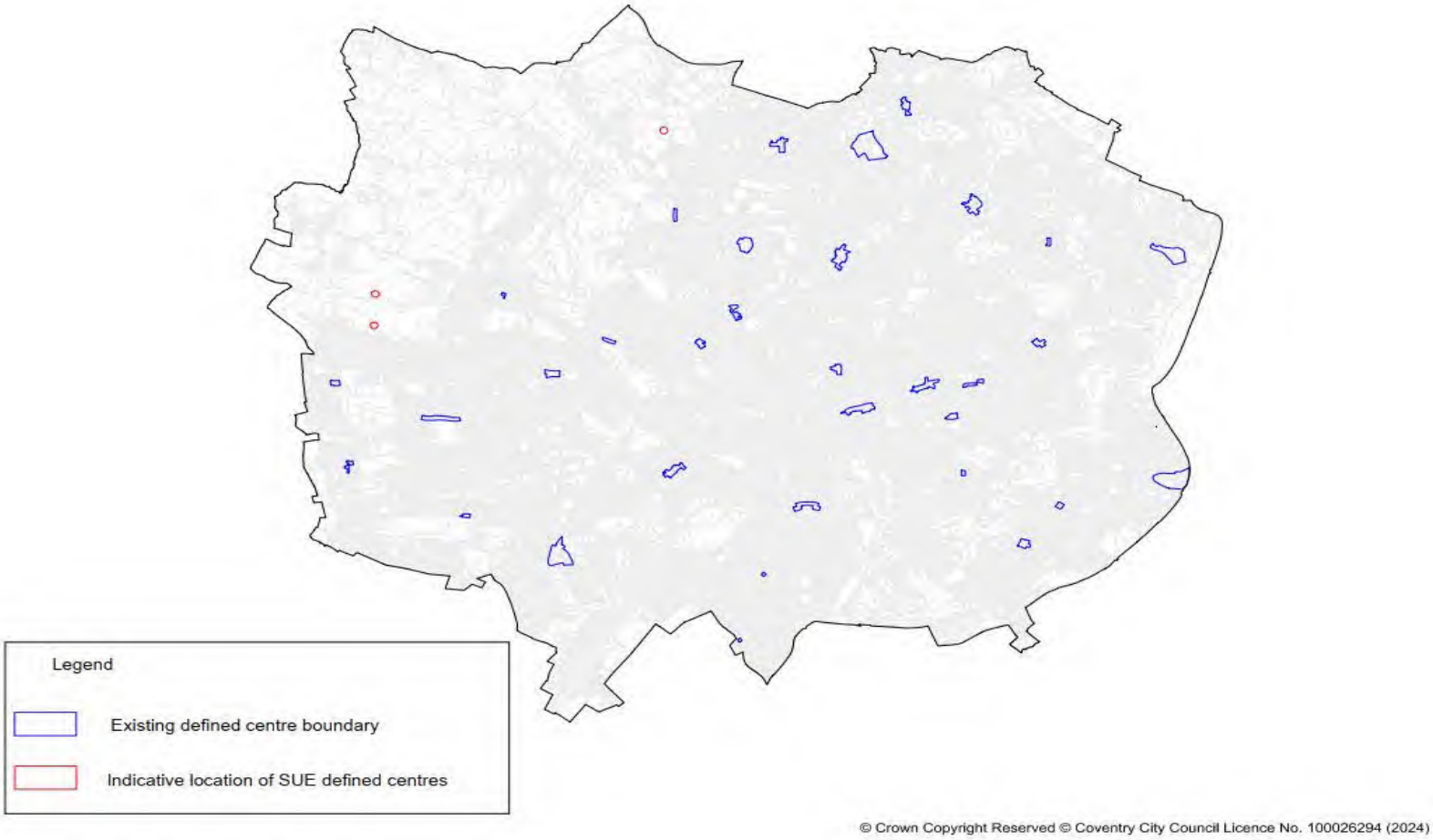
Appendix 9c: Affordable Housing Policy H6

Appendix 9d: City Centre Boundary and Transition Zone



Appendix 9e: Centres and Primary Shopping Areas

City Wide Centres Maps



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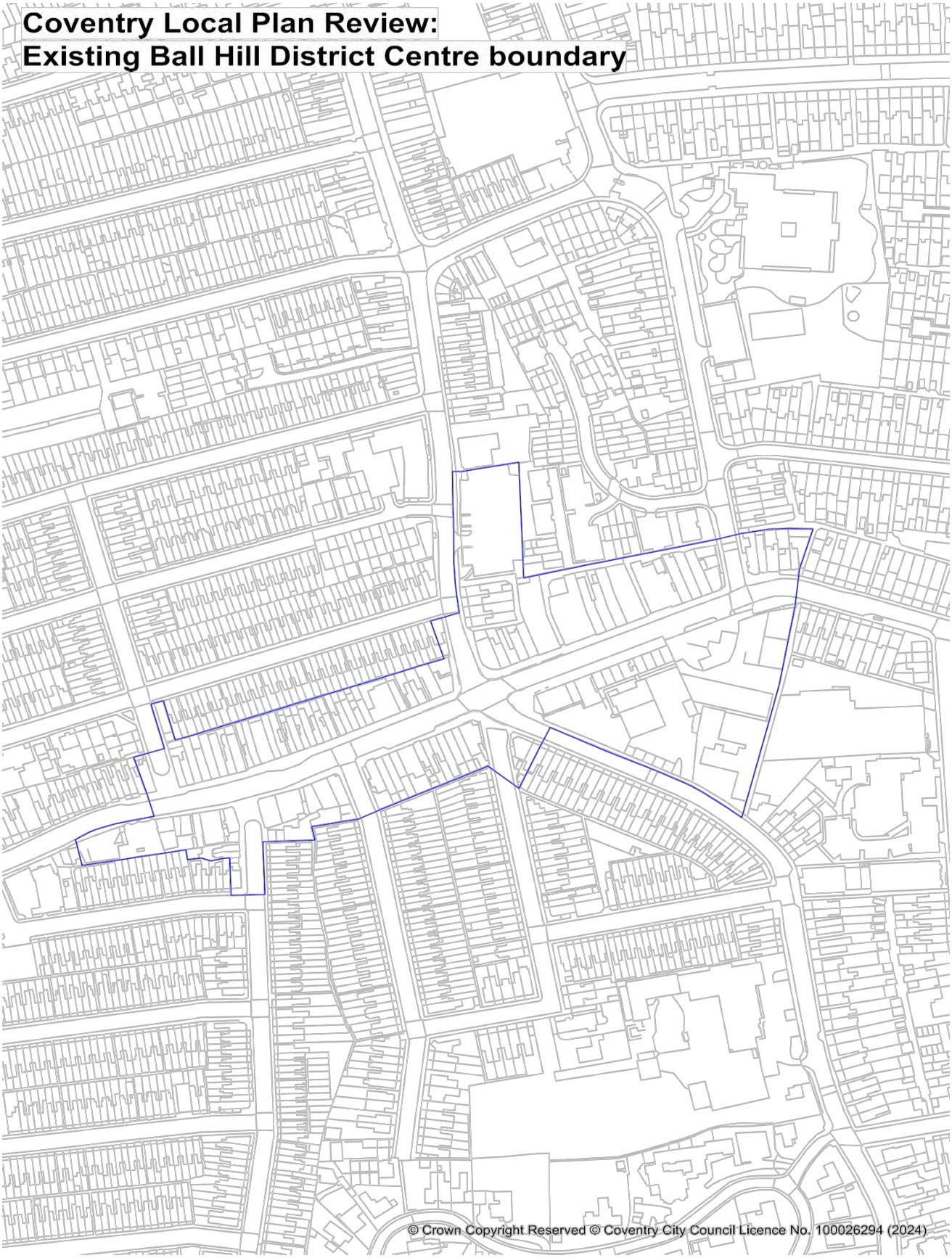
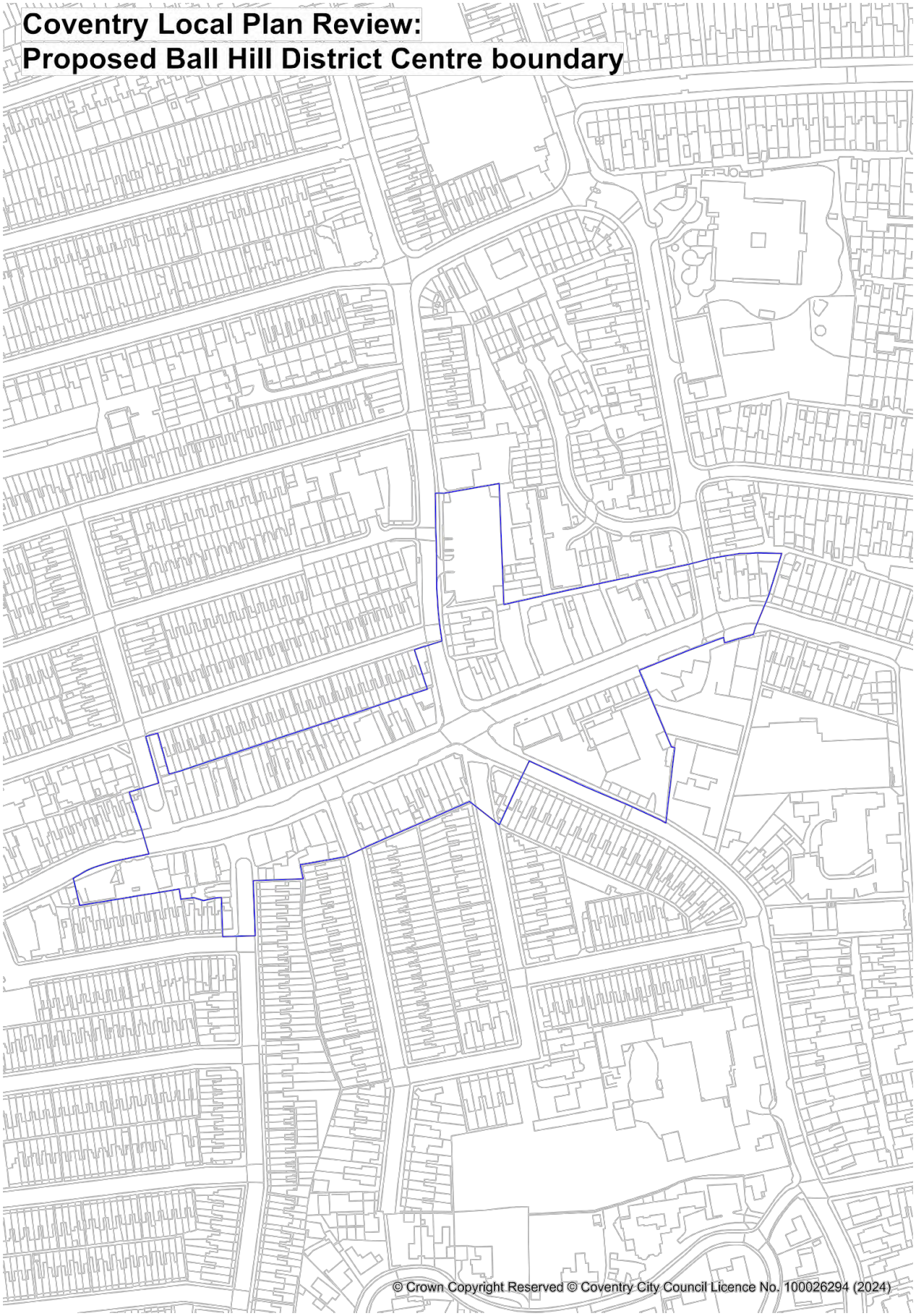
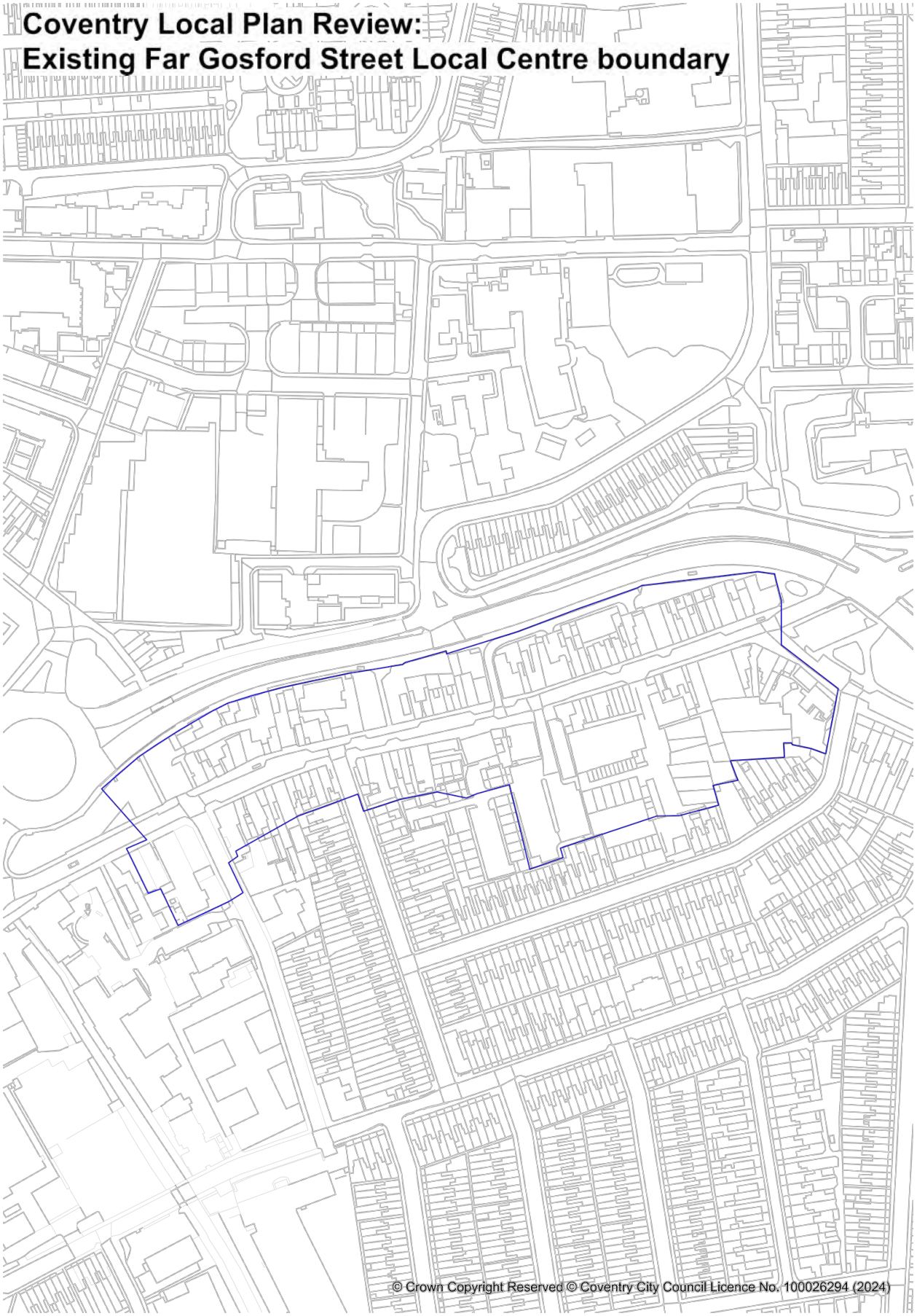
Proposed Centre Boundary Changes

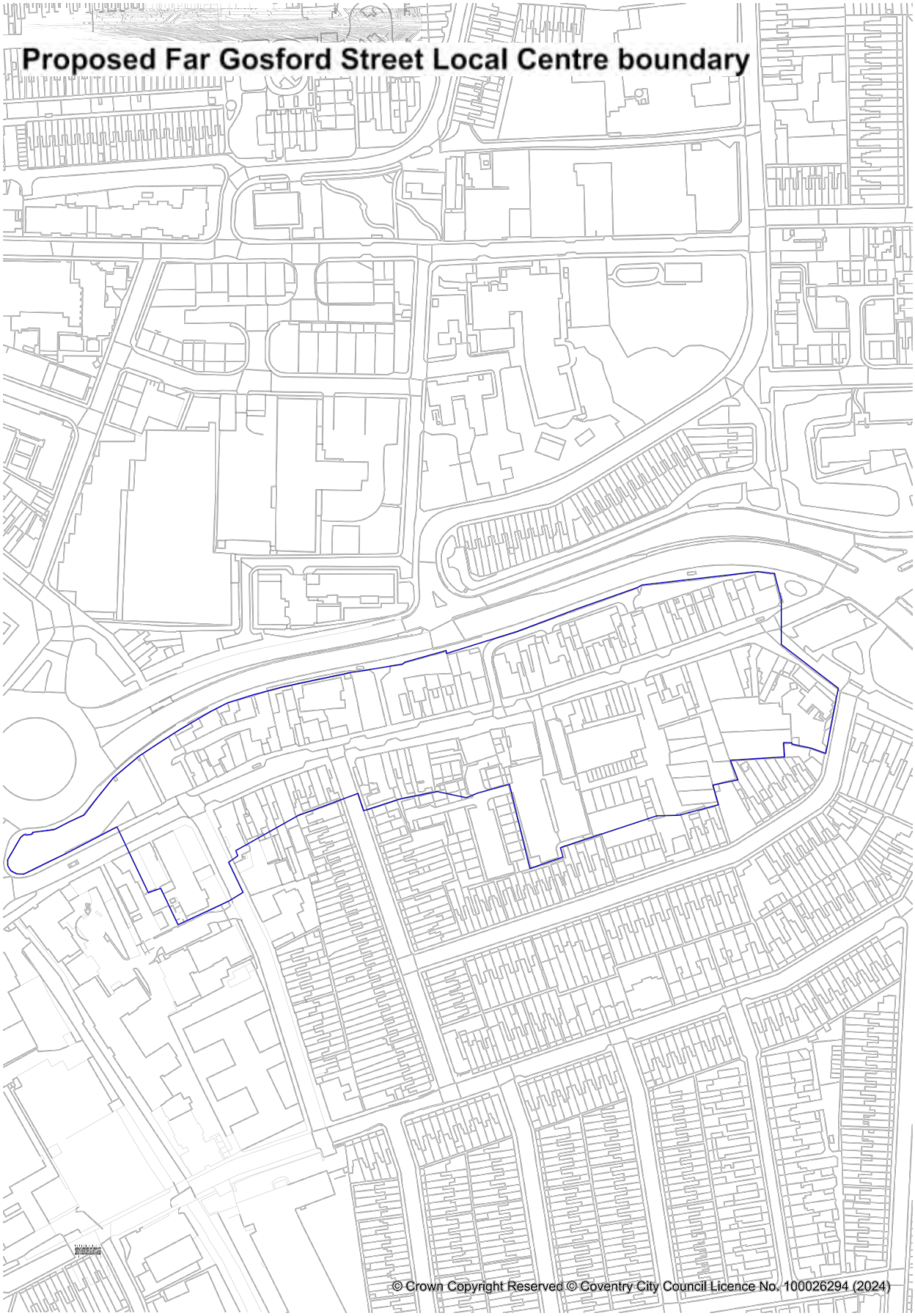


Coventry Local Plan Review:
Proposed Ball Hill District Centre boundary



Coventry Local Plan Review:
Existing Far Gosford Street Local Centre boundary




Proposed Far Gosford Street Local Centre boundary
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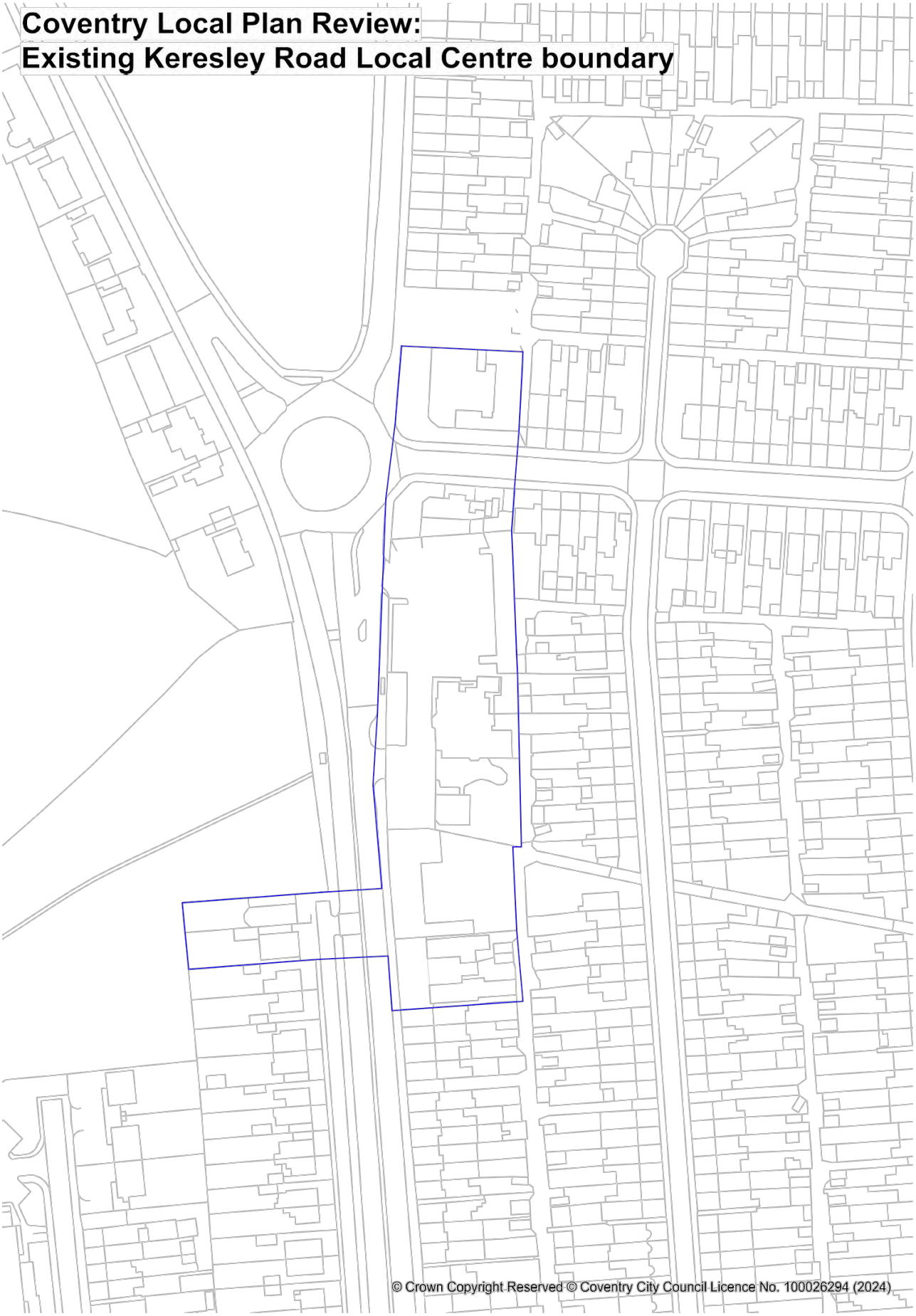
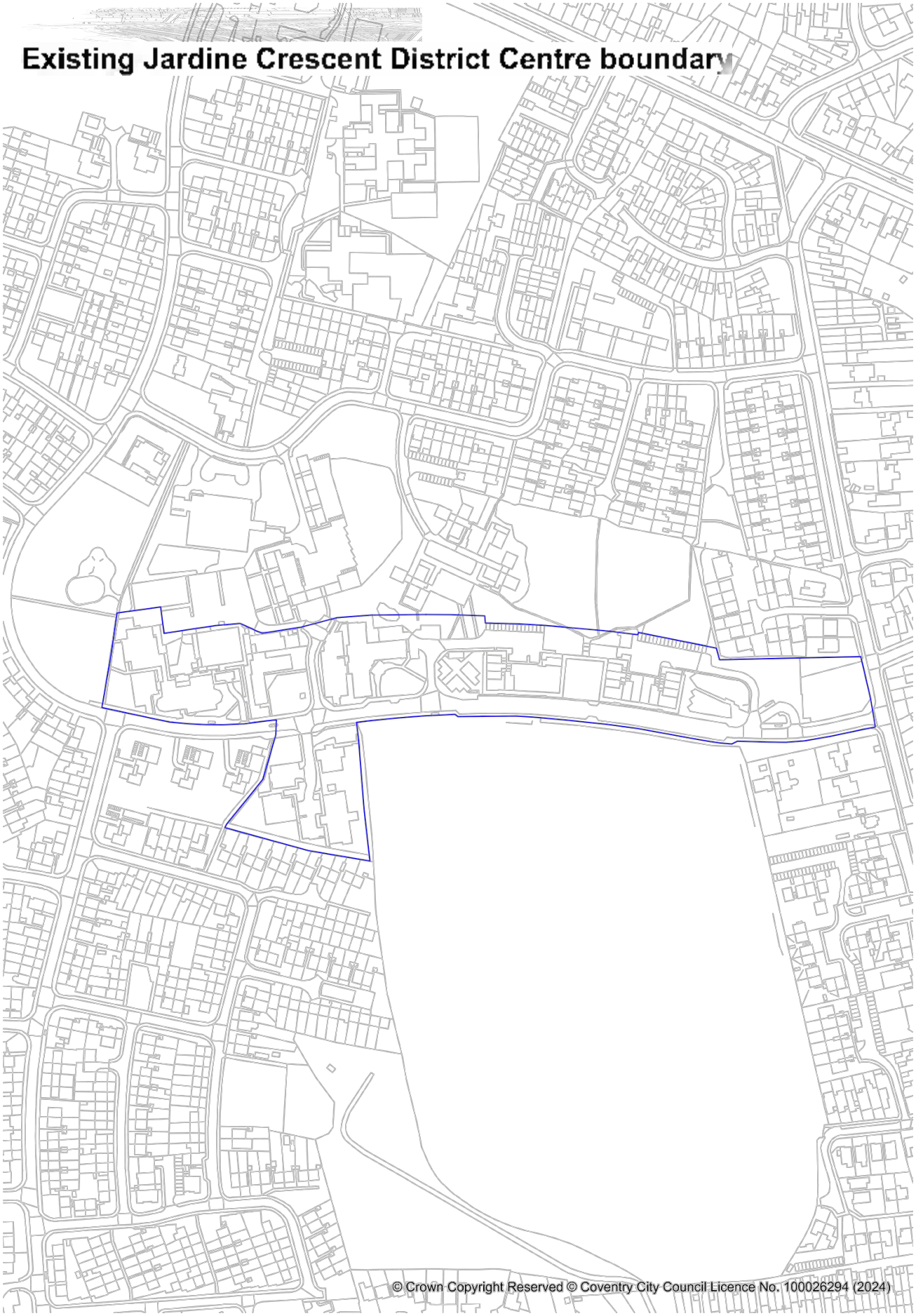
Coventry Local Plan Review:
Existing Keresley Road Local Centre boundary



Coventry Local Plan Review:
Proposed Keresley Road Local Centre boundary


Existing Jardine Crescent District Centre boundary
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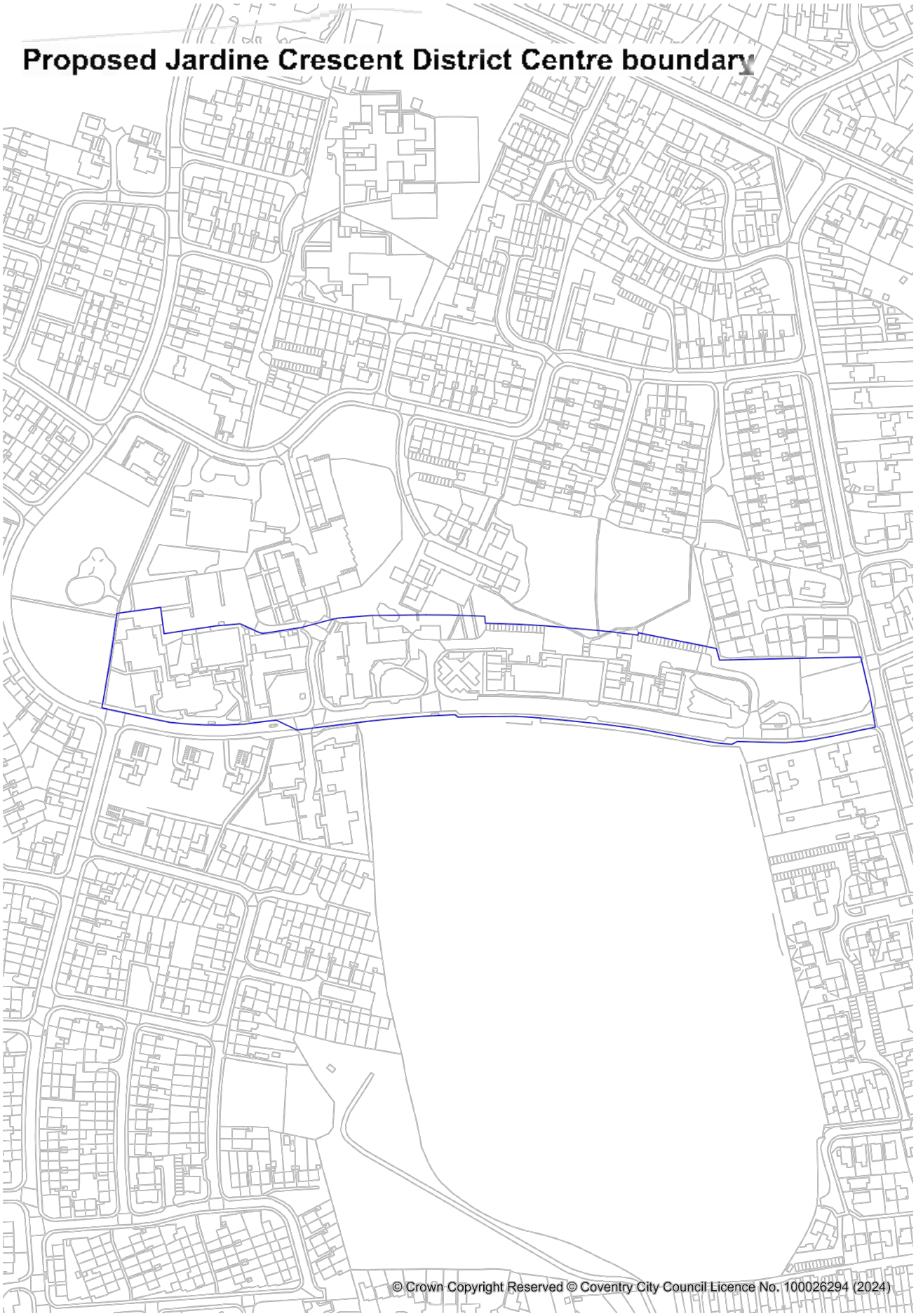
Proposed Jardine Crescent District Centre boundary
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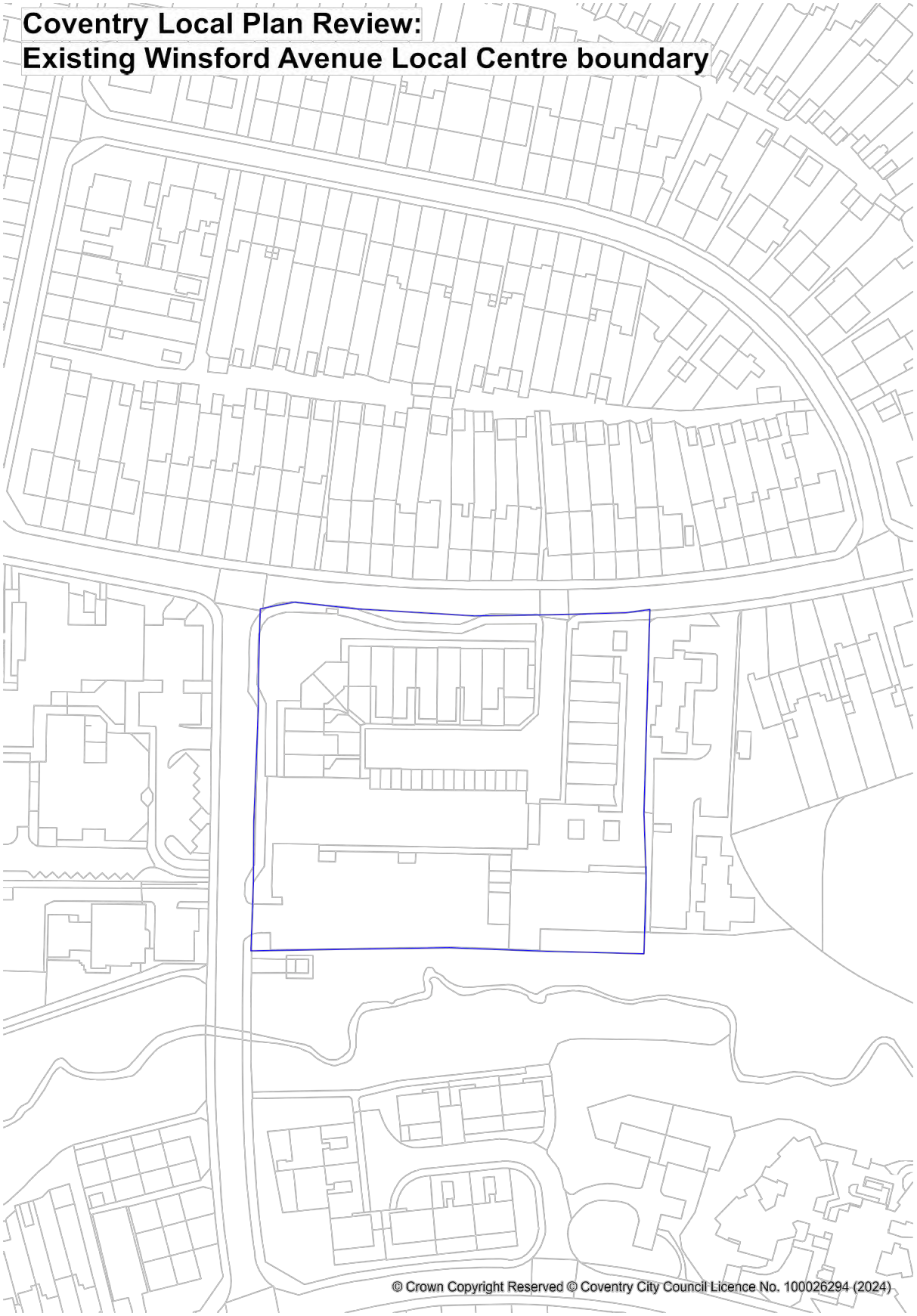
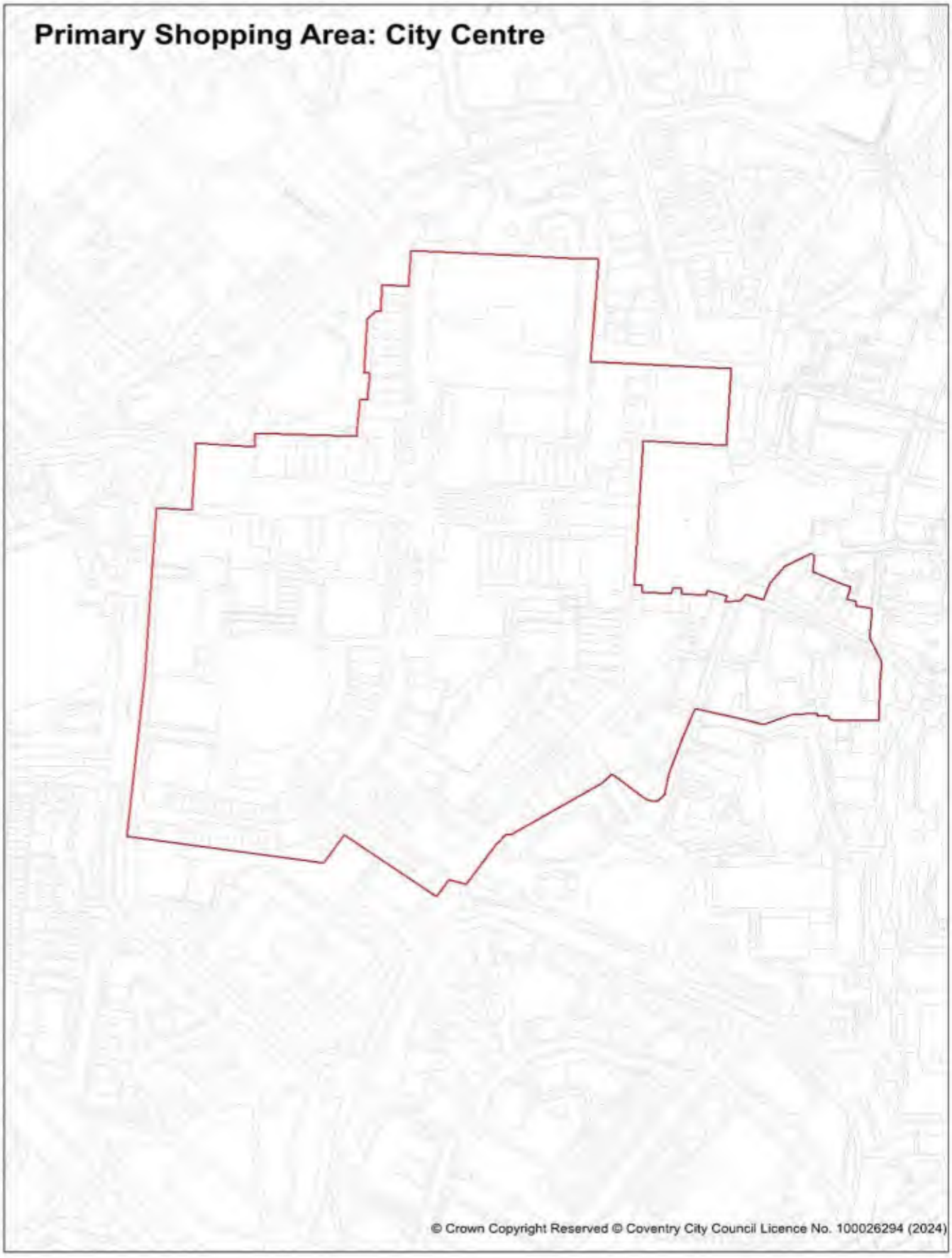
Coventry Local Plan Review:
Existing Winsford Avenue Local Centre boundary

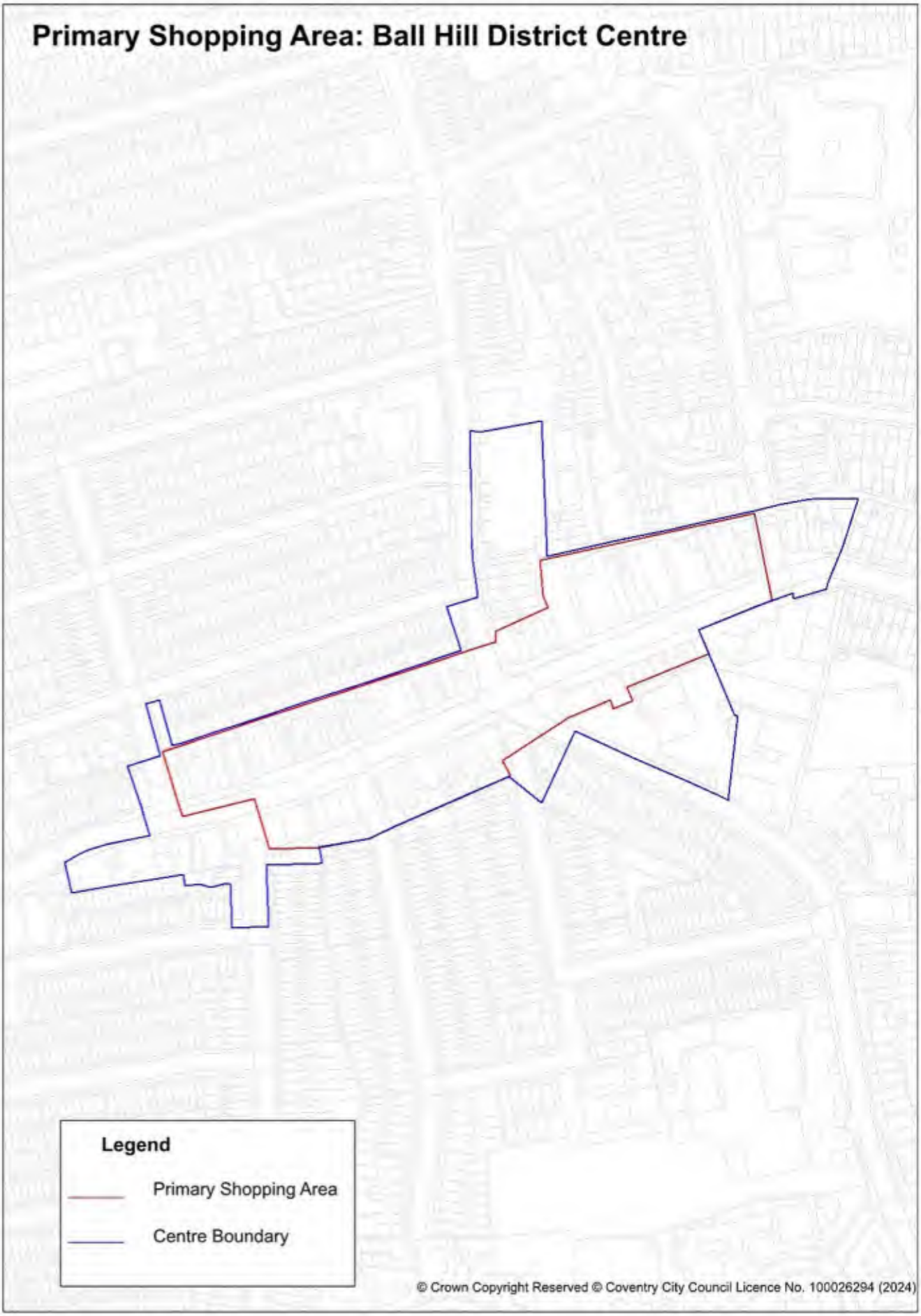


Coventry Local Plan Review:
Proposed Winsford Avenue Local Centre boundary

Proposed Primary Shopping Areas



Primary Shopping Area: Arena Park Major District Centre


Primary Shopping Area: Ball Hill District Centre
Legend
Primary Shopping Area
Centre Boundary
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Primary Shopping Area: Brade Drive District Centre
Legend
Primary Shopping Area
Centre Boundary
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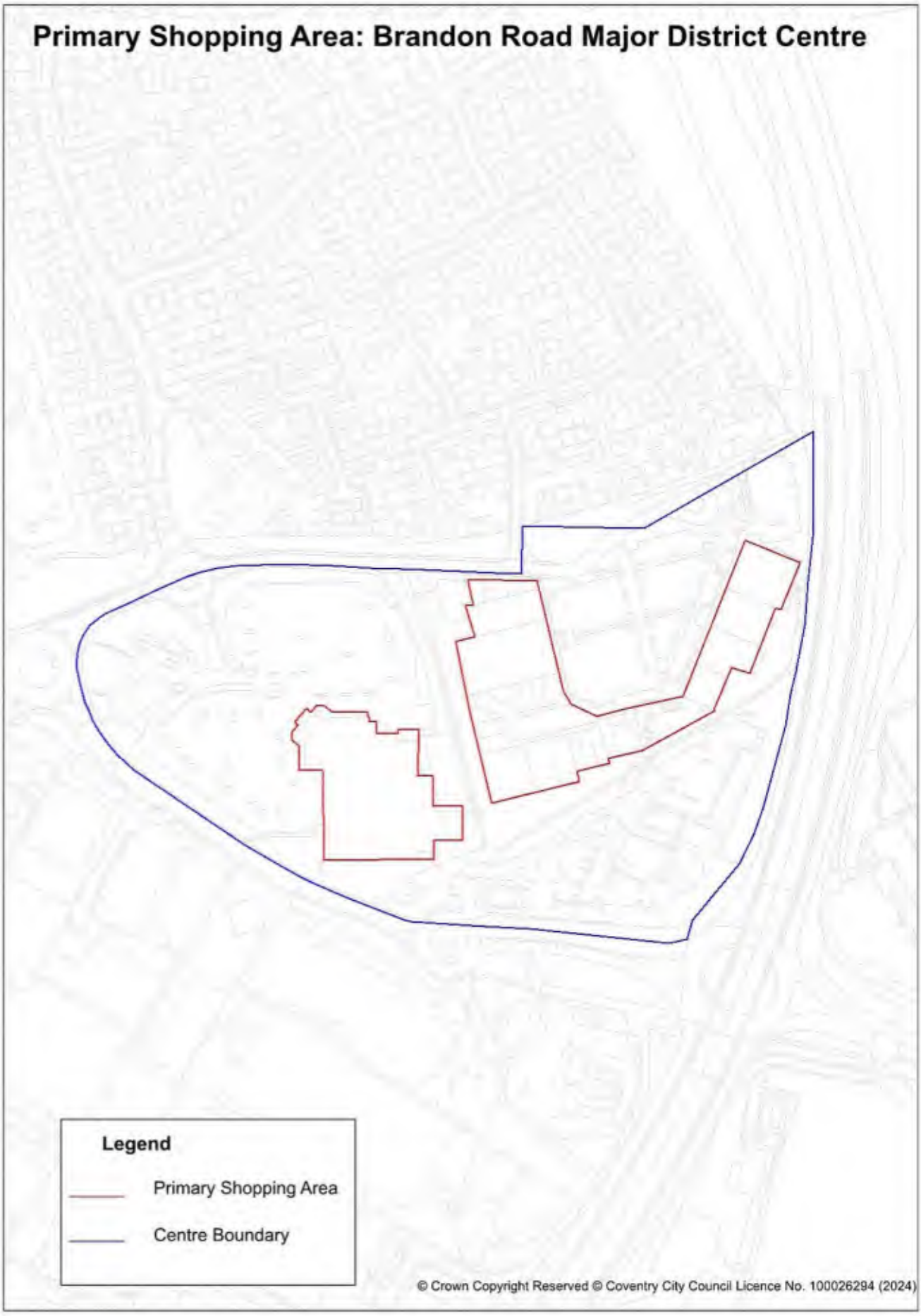
Primary Shopping Area: Brandon Road Major District Centre



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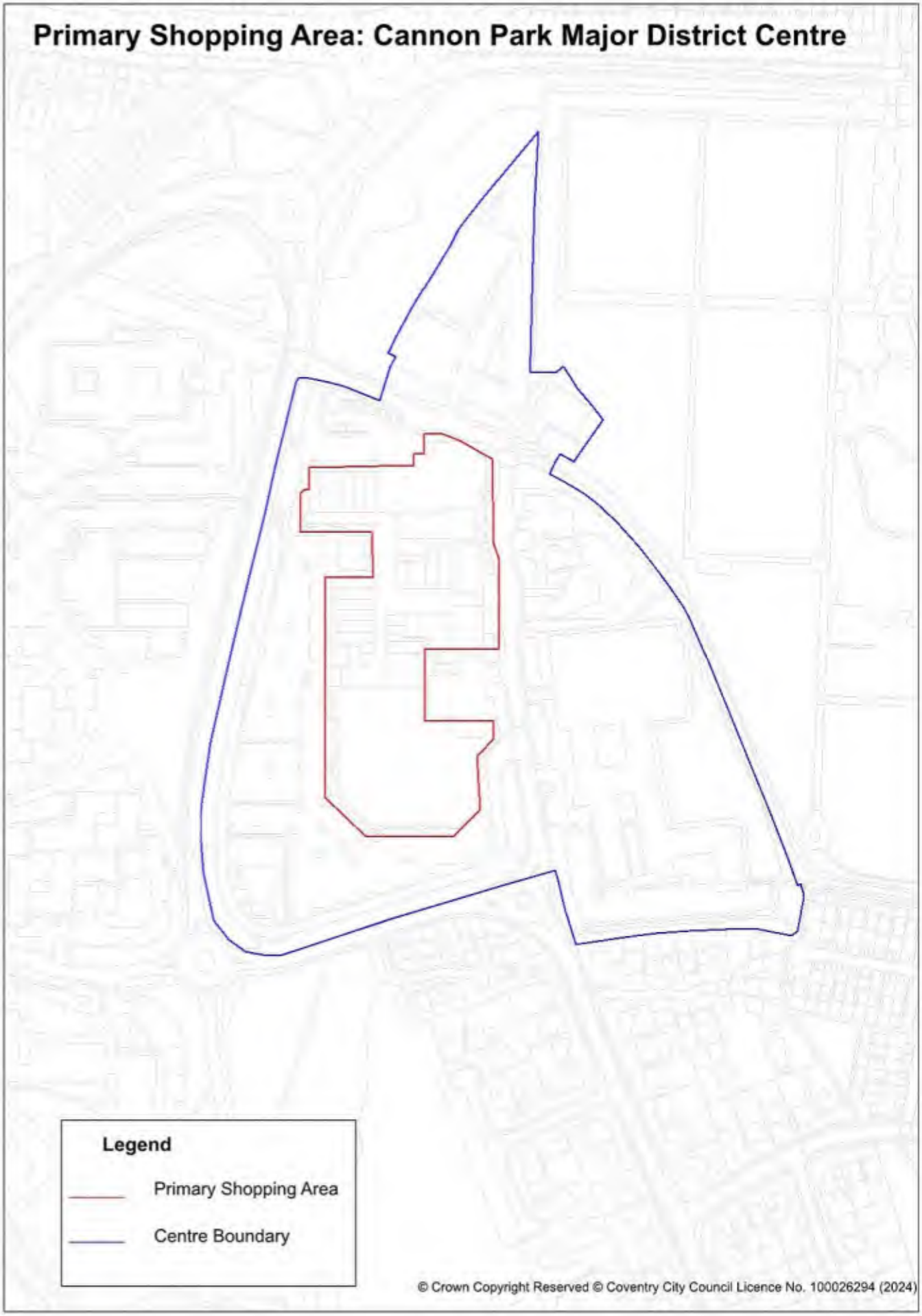
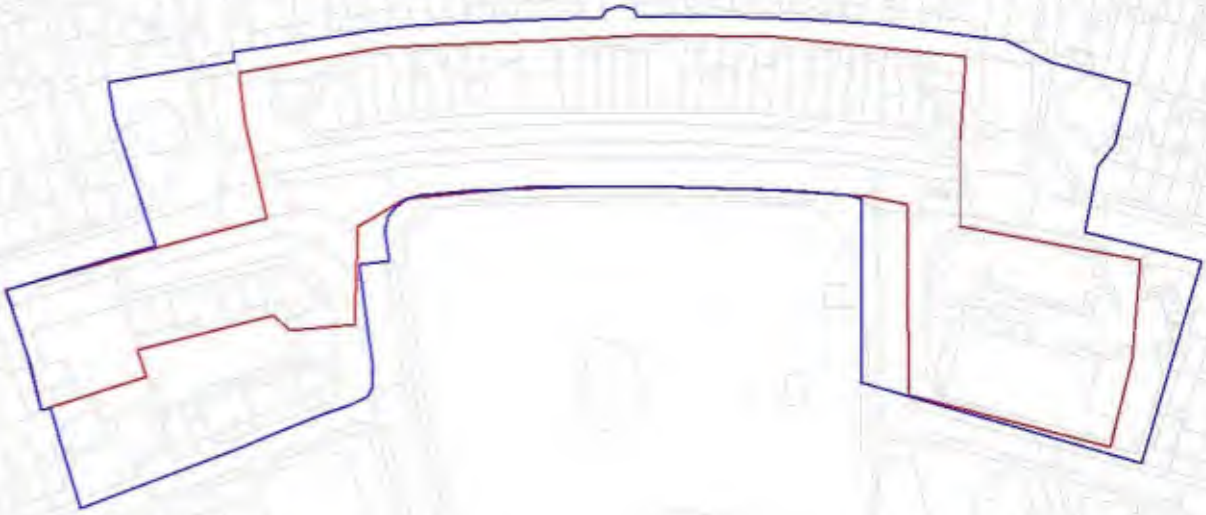
Primary Shopping Area: Cannon Park Major District Centre



Primary Shopping Area: Daventry Road District Centre



Legend

Primary Shopping Area

Centre Boundary

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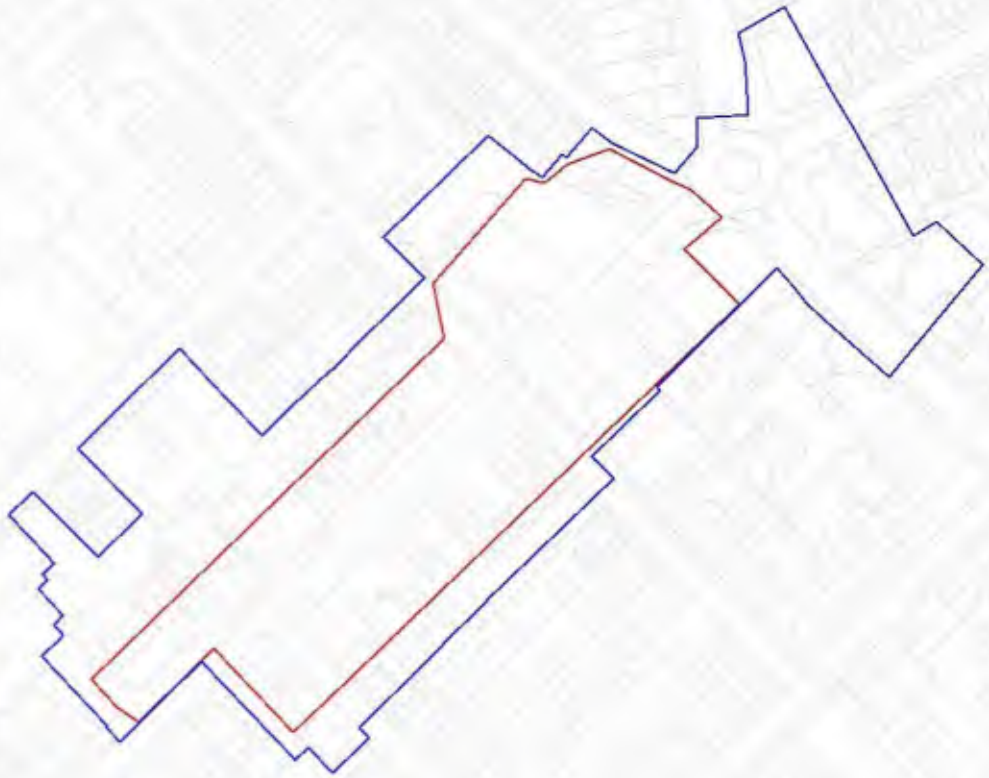
Primary Shopping Area: Earlsdon District Centre



Legend

Primary Shopping Area

Centre Boundary

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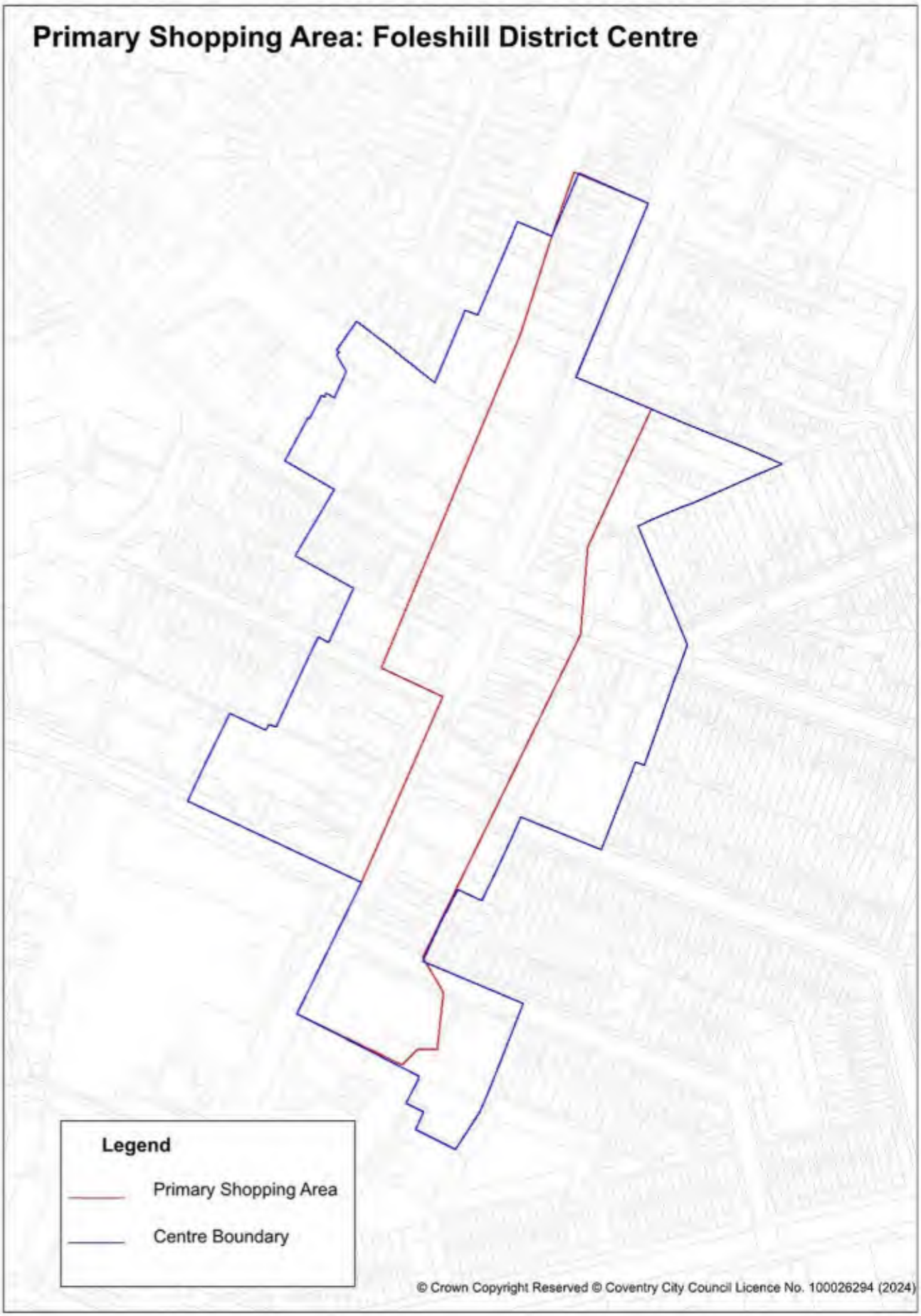
Primary Shopping Area: Foleshill District Centre
Legend
Primary Shopping Area
Centre Boundary
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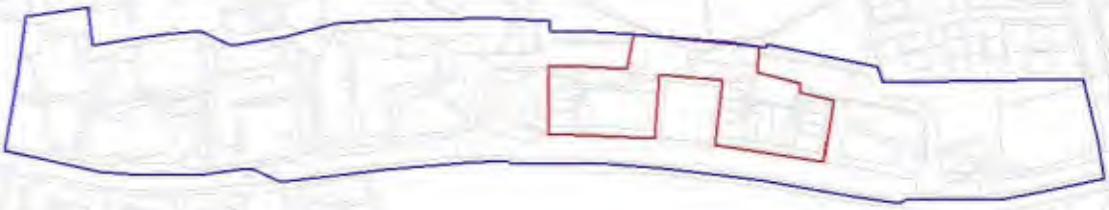
Primary Shopping Area: Jardine Crescent District Centre



Legend

Primary Shopping Area

Centre Boundary

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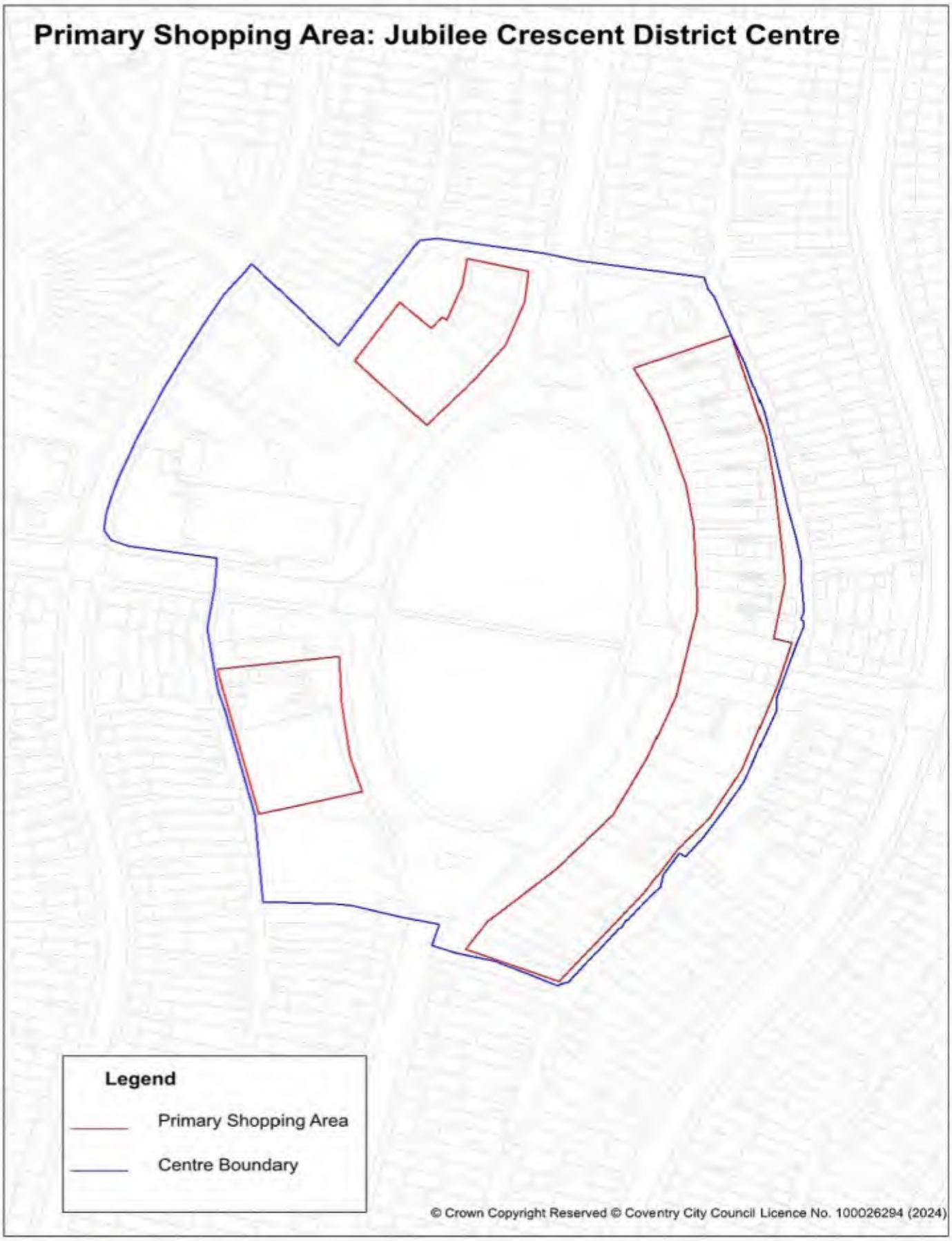
Primary Shopping Area: Jubilee Crescent District Centre
Legend
Primary Shopping Area
Centre Boundary
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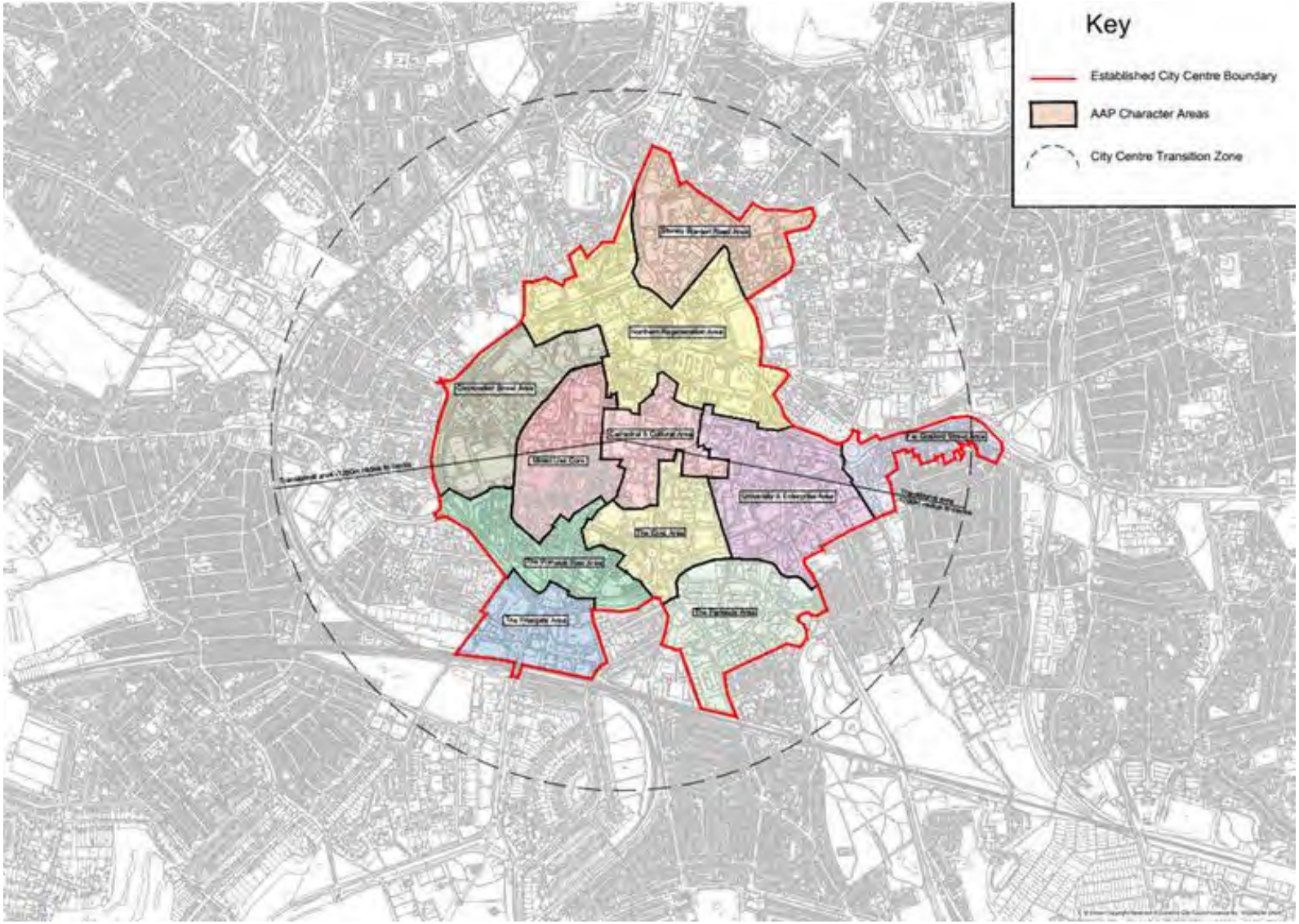
Appendix 9f: City Centre Character Area



Key issue summary	
	Chapter 1 - Introduction
	The lack of a transport model and evidence have been raised by a representor, alongside encouragement of cooperation; additionally, expressing preference towards the adding of the A46 Coventry Junctions Scheme to the CASM 2041 Baseline. Some supportive comments were received regarding the Vision, One Coventry Plan and the support for redevelopment with the goal of improving the economy, sustainability and life quality in the area, however the lack of allocation of Central City Industrial Estate was questioned.
	Chapter 2 - The Vision
	Supportive comments were received from some representors regarding the fight against climate change, promoting sustainability, moving towards a zero-carbon economy and ongoing collaboration. A representation was received in general support of the Vision, however criticising policies DS1, DS2, JE1, JE2 and GB1 as contradictory to the Vision.
	Chapter 3 - Overall Levels of Growth and the Duty to Cooperate
Policy DS1 - Overall Development Needs	Some comments were received regarding the Plan period being too short, the Plan having a retrospective start date and an early review being necessary, concerns about Duty to Cooperate regarding unmet need from neighbouring authorities. The low provision of housing, including affordable housing, as well as overprovision of PBSA, and lack of Green Belt review were also brought up. An issue with the evidence base not sufficiently demonstrating exceptional circumstances was raised. An opposing issue was brought up, detailing that the proposed housing figure is too high and community needs are ignored. Additionally, the issue of not meeting the employment land need and the allocation of Baginton Fields have been raised. Some comments were received regarding lack of details for modernisation and improving the quality of existing floor space on employment sites.

	Some comments were received in favour of proposed delivery of sustainable transport on development sites. A critique of the SUEs destroying the environment, lack of protection of the Green Belt and lack of master planning was brought up.
Policy DS2 - The Duty to Co-operate and partnership working	Positive comments received regarding participation in Duty to Cooperate meetings, commitment to cooperate and ongoing collaboration. Furthermore, acknowledgement received in relation to the lack of space within the city. Issues with the housing need number provided being too low and the exporting of unmet housing and employment needs to the Neighbouring Authorities before considering availability within the city were raised. Comments encouraging the release of sites from Green Belt were received. Lack of evidence regarding the unmet needs being met through Duty to Cooperate was brought up. Comments urging the reconsideration of new employment sites and new junctions were received. Issues regarding lack of transparency when it comes to Duty to Cooperate were raised. The deliverability of sites was questioned by some representations. Comments were received regarding Coventry residents' access to affordable housing opportunities within Warwickshire. Some comments regarding a surplus of available housing land, encouraging de-allocation of land and taking on the Neighbouring Authorities' unmet need have been received.
Policy DS3 - Sustainable Development Policy	The need for a Coal Mining Risk assessment in the eastern part of the city has been raised for both safety and environmental protection reasons. Some comments received regarding the lack of policy mention regarding reduction of crime through planning. No inclusion of Kersley in DS3 was raised. Some comments encourage more details to be included regarding the role of tilted balance. Comments received regarding more details about economic growth and tackling poverty. Low need for new housing and overprovision of PBSAs was raised. Some comments were raised praising the decarbonisation of the public transport. However, the issue of the Very Light Rail not being operational was brought up.
Policy DS4 - Masterplan principles	Some comments were received in favour of the allocations and comprehensive planning. Support received regarding the importance of green infrastructure provision in Masterplans and connectivity between Coventry City and Warwick District. Some comments called for the protection of the local context and design. An issue with the lack of masterplanning for Baginton Fields

	and no mention of the Very Light Rail was raised. The need to safeguard existing utility infrastructure onsite was outlined in some comments. Concerns raised regarding transport access to Eastern Green. Some comments received regarding references to unmet employment and housing need. The idea of mini-masterplans for the University campus was brought forward.
Specific paragraph comments (non-policy)	Some comments raised regarding the use of an alternative method for the housing targets and its impact on DtC, encouraging the use the New Standard Method (NSM) instead.
	Chapter 4 – Health and Wellbeing
Policy HW1 - Health and Health Impact Assessments (HIA)	Comments supporting the wording of the policy were received. An issue regarding the lack of an updated Health SPD was raised. Some comments received regarding the disproportionality of the HIA being required for major developments. An issue was raised regarding the references to an SPD within the Local Plan.
Specific paragraph comments (non-policy)	Support and offer of collaboration received.
	Chapter 5 - Jobs and Economy
Policy JE1 - Overall Economy and Employment Strategy	Stronger references to improving sustainable transport links were requested. Some comments raised the issue of employment land needs potentially being provided outside of Coventry's boundaries in contradiction to the objectives set out in the policy. An issue regarding the lack of inclusion of Westwood Business Park as an allocated employment site was raised. Some comments received highlighting the need for site allocation for employment close to the boundaries agreed through SoCGs and MoUs, and a forward-looking evidence base to avoid underestimation of local need. The employment land needs figure was questioned, as it may be too low. Modification of the wording to reference the University of Warwick SPD was requested. Support of protection of existing employment sites and sustainability was raised. Some comments received in favour of the opportunity to cooperate. Support of the wording around sustainable technologies, alongside a request for minor modifications to support modernisation of sites were received. General support received

	alongside a request for more explicit references around university contributions.
Policy JE2 - Provision of Employment Land and Premises	An issue was raised regarding the lack of a Green Belt review and unmet employment land need. Some comments received in support of protection of existing employment sites. The deliverability of sites was questioned. Concerns raised regarding Baginton Fields, requesting their de-allocation and protection. Lack of new allocations being proposed and lack of clarity regarding committed supply were questioned. Comments received regarding the need for MoUs. Comments outlining general opportunities regarding sites were brought forward.
Policy JE3 - Non-Employment Uses on Employment Land	General support received regarding the protection of existing sites with some minor modifications regarding the strengthening of the wording.
Policy JE5 - Industrial and Storage / Distribution Development	An issue was raised regarding lack of clarity as to whether the policy refers to local or strategic needs. Comments received regarding lack of sufficient provision of employment land and windfall not being a means of addressing projected needs. A concern was raised over the potential impact of B8 sites and a request for stricter wording was received. Lack of clarity due to a typo was pointed out.
Policy JE6 - Tourism/Visitor Related Development	A request was brought forward to reference University of Warwick in the policy.
Policy JE7 - Accessibility to Employment Opportunities	An issue was raised with a lack of explicit reference to active travel links to employment.
Policy JE8 - Location of Research and Development (R&D)	A request for bigger flexibility on university sites was received.
Overarching comments (non-policy)	Comments received raising an inadequate supply and deliverability of employment sites, the predicted employment need number being too low, and slow speed of development over the recent years.
	Chapter 6 - Delivering Coventry's Housing Needs
H1 - Housing Land Requirements	Comments considered that SM plus uplift not being used due to no sufficient demonstration of exceptional circumstances was not appropriate. An issue was raised over the approach limiting the

	supply of affordable housing and diversity of the existing house stock. Comments outlined that there is insufficient evidence to demonstrate compliance with the DtC. An issue was raised calling for release of more sites from Green Belt. The Plan period was questioned, highlighting that a minimum 15 years from adoption is ensured. Concern was raised regarding the Plan period looking back 5 years being a manipulation of figures to avoid meeting the housing needs. Some comments urged that Coventry take some of Birmingham's shortfall and no historic lapse rate being provided was questioned. Some comments were received regarding the possibility of the windfall being higher than the allowance set out by the Council and lack of consideration of future trends of windfall delivery. Clarification requested regarding counting allocations, for example where a site is a carried forward allocation but also has consent or identified HELAA sites coming forward as windfall. Concern raised over lack of certainty around delivery of sites allocated in HELAA and deliverability of sites due to commitments with outline permission. Comments questioned whether it is justified to use two different methodologies for one Housing Market Area and sub-region.
H2 - Housing Allocations	Green Belt Review requested. Viability concerns of brownfield sites for both full net zero and fabric only policies raised. Deliverability and viability issues raised regarding Friargate, Walsgrave Hill Farm, Central police station and 12 existing allocated sites. Removal of sites deemed undeliverable was requested, including Walsgrave Hill Farm, Carlton Road, land at Mitchell Avenue, Durbar Avenue and Jadine Crescent. Request for a net figure for Spon End was received, as well as increasing of allocated capacity of the Keresley SUE. Objections to Whitefriars Car Park and Dale Building Tower Street received due to quantum of development sought and no plan heritage assessment done for the sites. Heritage considerations and heritage impact assessments requested for Walsgrave Hill Farm, Sandy Lane, Central police station, New Union Street Car Park, Allesley Hotel, Spon End, CCS, Friargate. Level 2 SFRA requested for Spon End. Concern raised regarding wording of H2:3 not being consistent with national policy. Amendment to the wording of "total dwellings" was requested, some comments requesting the change to be a "maximum", some to be

	"Assessed Capacity Number of Dwellings". Comments questioned whether the allocated housing numbers have been deliberately inflated to justify avoiding the release of green belt land. Safeguarding of overhead line of the southern portion of Walsgrave Hill Farm requested. Concern raised over loss of playing fields and lack of an assessment at Mitchell Avenue and Baginton Field. Support received regarding allocations of least environmental value. Land promotion for the next local plan received. Comments supporting approval of Sandy Lane were received. Returning of sites, such as some parts of Keresley SUE, to the Green Belt was requested if they do not have planning permission. Concern raised over possibility of total housing being surpassed in Keresley SUE. Identification of grey belt sites requested. Release and allocation of sites in Green Belt (such as HELAA Ref. WES- 003-23) was sought by some comments.
H3 - Provision of New Housing	Lack of evidence to adequately justify requiring NDSS and no flexibility allowed in applying NDSS and M4 standards were brought up. Inclusion of a lead in time period for all the requirements coming into force and set out what it means for approved outlines and their RM submissions were requested. An issue was raised with referencing standards in SPDs and other Council documents like the transport strategy within the policy is against the PPG, as SPDs, which have not been through examination or viability checked are there to support policy and not to create it or to have the same status as policy. Comments outlined that point 7 on self-build and community led housing is repetitious and should be included in point 1. Definition of ANGST standards and a cross reference to the HMO DPD was requested. Amendments regarding provision of wheelchair accessible parking was requested to include eventualities in which providing 10% of units to full wheelchair standard could lead to a need of more than 5%.
H4 - Securing a Mix of Housing	Issues regarding lack of flexibility for proposals that would not fall under the exceptions in part 2 (sites that are unviable, small sites with constraints, etc.) were raised. Comments received regarding referencing the HEDNA, outlining that instead the mix should be specified in policy.

	There was concern over the impact of BNG costs not being considered.
H6 - Affordable Housing	Amendment requested to add in a clarification regarding the affordable housing provision for PBSA development being subject to viability. Concern was raised over 1ha site threshold for the AH requirement and excluding areas of the city from the requirement. Inclusion of the Building Safety Levy in the policy was requested. An issue was raised with referencing standards in SPDs and other Council documents like the transport strategy within the policy is against the PPG, as SPDs, which have not been through examination or viability checked are there to support policy and not to create it or to have the same status as policy. Justification and deliverability of the policies were questioned in regard to downgrading of contributions sought by EM11 if they would enable more affordable housing. Concern raised regarding delivery of the quantum of affordable housing.
H7 - Gypsy and Traveller Accommodation	Help with an allocation from another council was received as an opportunity to fulfil DtC. Inclusion of secure by design principles was requested.
H8 - Specialist Housing including specialist housing with elements of Care, Older Persons accommodation and hostels	Concern raised regarding possible conflation of Older Persons Housing (OPH) and M4, as well as lack of justification for M4(2) and M4(3) requirements for OPH. Concern raised regarding 10% of dwellings to be M4(3). Clarification was requested regarding M4(3) standards.
H9 - Residential Density	Clarification requested regarding whether the density figures are maximums or minimums. Concern raised regarding reliance on brownfield sites potentially causing under-provision.
H10 - Student Accommodation	Concern raised over clarity of the policy. The level of change of use applications from PBSA and the new uses being approved was questioned. An issue was raised stating that evidence should be commissioned to determine whether the city needs the alternative accommodation being proposed. Some representations considered the monitor and manage approach to not be appropriate given the level of oversupply and a more pro-active stance being required.

	Comments received stating Westwood Business Park should be retained to help address the Council's employment need. Amendment requested defining "immediately adjacent". Justification for the locational based approach was requested. Some comments received stating that campus and immediately adjacent is too tightly drawn and the evidence does not justify the high test of requiring exceptional circumstances outside these areas. Request received stating that the campuses should be shown on the proposal's map. Concerns raised stating that requirements to be flexible / adaptable in design are not justified and overly burdensome and costly for developers. Some comments stated that points 3 onwards would not be appropriate for PBSA provided on campus, especially the flexibility to be converted to C3 housing and dictation on the number of studio and cluster flats. Clarification on points 3 onwards was requested – point 3 and 4 accept off campus only. Concerns were raised regarding giving local plan status to SPDs.
H11 - Homes in Multiple Occupation (HMOs)	A cross reference to the HMO DPD was requested. Concern raised over the DPD not covering the whole city. A request was received regarding inclusion of the Longford Ward in Article 4.
H12 - Build to Rent	Bespoke accommodation arrangement requested by the university to meet staff and student needs. A request was received to re-insert references to opportunities for Co-Living and Build to Rent into the policy.
H13 – Co-living	An issue was raised regarding co-living being a sui generis use and onsite affordable housing not being applicable. Concern raised regarding the 25% AH requirement and minimum unit sizes unnecessarily restricting the market. Kitchen size and sharing capped at 8 people was considered to be an issue going against big communal arrangements. Onsite personnel being required was raised as an issue. Secure by design was requested.
Overarching comments (non-policy)	Comments received arguing that the total housing figure should be 35,693 and should be uplifted by 4,200. Some comments received stating the windfall allowance should be higher and that some allocations should be removed. A site was put forward within the Green Belt.
	Chapter 7 – Retail and Centres
Policy R2 - Coventry City Centre –	The addition of further detail in the policy regarding designing out crime and an evening policy was requested. Some comments regarding focusing on retail frontages were received. The support of green and blue infrastructure was received.

Development Strategy	
Policy R5 - Retail Frontages and Ground Floor Units in defined centres	A request for the addition of a specific reference regarding gambling and alternative financial services was received.
Policy R6 - Restaurants, Bars and Hot Food Takeaways	A request for the addition of a specific reference regarding crime and fear of crime in relation to hot food takeaways was received.
	Chapter 8 – Communities
Policy CO1 - New or improved social, community and leisure premises	General support received with a request for amended wording, changing "education" to "school".
Policy CO2 - Re-Use of or Redevelopment of Facilities	General support received with a request for amendments regarding a bigger flexibility of land use for healthcare services.
	Chapter 9 – Green Belt and Green Environment
Policy GB1 – Green Belt	Concerns raised regarding meeting Duty to Cooperate due to a lack of SoCGs and MoUs and public information regarding partnerships. An issue was raised with the lack of a Green Belt Review, inclusion of a Rural Exception Site Policy and encouragement to release land from the Green Belt was received. Some comments encouraged returning some land to Green Belt, such as part of the Keresley site.
Policy GB2 - Safeguarded Land in the Green Belt	Comments encouraged the development of safeguarded land at Westwood Heath alongside Warwick District Council. Concern raised over safeguarding land with no development starting and encouragement to return it to the Green Belt. Some comments encouraged releasing land in South Coventry from the Green Belt. A concern was raised regarding the housing crisis and housing land allocation being postponed until a future Local Plan update. Some comments encouraged the provision to release land at Westwood Heath without a review of the Local Plan once it is considered for development by the SWLP.

	Comments received in support of no decisions being made with regards to allocation of land on the southern boundary of Coventry before the SWLP reaches an advanced stage.
Policy GB3 - Local Green Space	A request was received for clarification on the policy's interaction with BNG. Amendment proposed to exclude land at Gibbet Hill Road from the Local Green Space designation. General support received, with additional support extended to Local Green Spaces being identified on the Policies Map and inappropriate development not being permitted without the existence of special circumstances.
Policy GE1 - Green and Blue Infrastructure	A request was received for clarification on the policy's interaction with BNG. Amendments were proposed to include an explicit reference to support the Green and Blue Environmental Agenda and raises the need for a specific policy capturing the intent to deliver public realm changes along Cox Street. Concern raised over the Green and Blue Infrastructure evidence being considered out of date. Expansion on environmental principles to better protect trees and habitats was proposed. Support received regarding de-culverting hidden watercourses across the City Centre. Strong support received regarding provision, protection and enhancement of green and blue infrastructure, as well as green infrastructure being used as a way of adapting to climate change. References to Water Framework Directive were supported.
Policy GE2 - Green Space	A concern was raised regarding a possible conflict between policies GE2 and GE3. The allocation of H2:19 and JE2:3 and the possible loss of playing field land were raised as a concern. A request was received for clarification on the policy's interaction with BNG. General support received. Support received regarding de-culverting hidden watercourses across the City Centre.
Policy GE3 - Biodiversity, Geological, and Landscape Conservation	A concern was raised regarding a possible conflict between policies GE2 and GE3. Clarification requested regarding protection of SSSIs from development, and differentiation between the mitigation and BNG delivery hierarchies. An issue was raised regarding the lack of reference to Local Wildlife Sites and Potential Local Wildlife Sites, a request to add more ambitious wording was received. A request was received regarding the exclusion of a reference to bird and bat boxes and replacing it with swift bricks instead. A request for amending the wording to allow exceptional permission for development to maintain and improve the railway. A request to reference the projects to improve public realm undertaken by the

	university was received. Amendments requested to require 20% BNG and deliver a rich mix of habitats. A concern was raised regarding the wording of the policy implying that the BNG should be over 10% and its influence on viability, and delivery of affordable housing. General support received. Support received regarding the reference to Local Nature Recovery Strategies, alongside a request for more detail.
Policy GE4 - Tree Protection	General support received. Amending the wording to allow exceptional permission for development to maintain and improve the railway was requested. Clarification was requested on the policy's interaction with BNG. Stronger mitigation strategies were requested, including giving weight to the LNRS and buffering standards. A Tree Canopy Target was requested to be added alongside a 30% target for land in nature recovery.
	Chapter 10 – Design
Policy DE1 - Ensuring High Quality Design	Comments received requesting modifications regarding car parking requirement in developments and cycle parking. Additionally, the prioritisation of local building materials in the policy was requested. Issues were raised with lack of reference to designing out crime and the status of SPDs. The needs of younger part of the population were highlighted. Support received regarding ensuring adequate waste storage and collection; the policy promoting safety; sustainability and green infrastructure.
Policy DE2 - Delivering High Quality Places	Comments received in favour of public art, however requesting a modification regarding the payment of a commuted sum in case the art is maintained privately. Support received regarding meanwhile uses, however a request for clarification regarding use investigation was also received.
	Chapter 11 – Heritage
Policy HE1 – Conservation Areas	Conservation Area review requested.
Policy HE2 - Conservation and Heritage Assets	General support received. Comments requesting modifications regarding designing out crime were received. Concerns raised regarding the sustainability of reusing heritage sites.

Policy HE3 - Heritage Park – Charterhouse	General support received alongside a request of modification to mention renaturalisation of the river Sherbourne. A request to update the map has been received.
Policy HE4 - Archaeology	General support received. Minor modifications requested regarding wording relating to previously unrecorded archaeology.
Overarching comments (non-policy)	Request to review the conservation area appraisal process received and an issue raised regarding the reason why the entirety of the canal has special interest.
	Chapter 12 – Accessibility
Policy AC1 - Accessible Transport Network	Support received for active travel and improvement of connectivity. A reference to LTN 1/20 and safe travel was requested. Additionally, a request to add a reference to support active travel training was received alongside the initiative to collaborate with the university.
Policy AC2 - Road Network	Concern raised regarding sustainable development of Baginton Fields, possible congestion and lack of active travel. Clarification requested regarding whether the required provision of EV charging is based on the availability of viable means of power. Support received for the requirement for the provision and integration of intelligent mobility infrastructure.
Policy AC3 - Demand Management	Clarification requested regarding updates to mode shift targets and the definition of micro-mobility. Concern raised regarding the continuation of sustainable travel use once Mobility Credits expire; comments encourage high quality active design. Concern raised regarding car parking provision. Support received regarding encouragement of sustainable travel. Offer of collaboration received regarding a nuanced approach to parking provision, availability of EV charging and cycle hubs.
Policy AC4 - Active Transport Provision including Walking, Cycling and Micro Mobility	Amendment requested to include direct and desirable routes, and a reference to desirable minimum widths in LTN 1/20. A reference to safe travel and e-scooters/e-bikes was requested. Amendment requested to specify clear cycle routes at the edge of the ring road. A concern was raised regarding impact on local habitats. Support received regarding further detail to cycle parking standards, and high priority being placed on walking and cycling; advantages of active travel, such as health benefits, reduced congestion and pollution.
Policy AC5 - Bus, Demand Response Transit and Rapid Transit	A request was received to add a clear definition of mobility hubs, a reference to safe travel and the Gigapark as part of the Very Light Rail route. Support received regarding the inclusion of Very Light Rail, promotion of sustainable transport and demand for improved accessibility in

	the policy. Information about sharing the survey results regarding active travel was received from the university alongside an offer of collaboration.
Policy AC6 - Rail	Adding additional guidance, such as the West Midlands Strategic Advice 2022, was requested. A concern regarding not listed transport projects arising and a request to add that the list may be subject change were received. Adding a reference to safe travel was requested. Support was received regarding the ambition to improve rail and rail station connectivity on a regional and local scale, and the impact on reducing carbon emissions.
Policy AC7 - Freight	Support received regarding parking and facility provision for HGVs, promotion of sustainable delivery methods, as well as ambition to reduce HGV traffic. Concerns were raised regarding air quality, HGV movements, poor public transport and its impact on job connectivity, traffic and pollution impacts tied to B8 sites and cross-boundary applications. Further concerns were outlined regarding lack of mention of possible mitigation strategies and references to the WMSESS threshold of 25ha.
Overarching comments (non-policy)	A request to add a reference to LTN 1/20 was received. Support towards Advanced Stop Lines received alongside concern that these would not be sufficient on their own. Support was received regarding pedestrian improvements and prioritisation of active travel.
	Chapter 13 – Environmental Management
Policy EM1 - Planning for Climate Change Adaptation	General support received regarding creating energy from waste and ambitious goals in order to reach net zero. Further guidance requested regarding the calculations to achieve net zero. Concern raised regarding the impact of the policy requirements on viability of development. An issue was raised with the evidence being out-of-date.
Policy EM4 - Flood Risk Management	General support received regarding ambitious goals to redevelop of the city centre. Support received regarding requirements to reduce flood risks and retention of natural river channels. Some minor wording changes were requested to make the meaning clearer and ensure proper flood risk mitigation.
Policy EM5 - Sustainable Drainage Systems (SuDS)	A request was received for clarification on the policy's interaction with BNG. Including a reference to the protection of controlled waters in the context of SuDS was suggested.
Policy EM6 - Redevelopment of Previously	Concern raised regarding the impact of the policy requirements on viability of development. Support received regarding references to the Water Framework Directive.

Developed Land	
Policy EM7 - Air Quality	A suggestion to include walking and cycling as part of low-emission transport was received. Concern raised regarding compliance with the Air Quality SPD being a Local Plan policy requirement.
Policy EM8 - Waste Management	Support received regarding consideration of waste management land suitability, prioritisation of waste prevention, recycling and safeguarding of existing waste management sites. Suggestion received regarding assessing need for the development of additional waste management capacity within the Coventry area over the Plan period.
Policy EM10 - Non Mineral Development in Mineral Safeguarding Areas	Request received to remove references to the Coal Authority in the policy and instead add signposting to its Permitting and Licensing teams, and the need for an Incidental Coal Agreements to remove coal from site during development works.
Policy EM11 - Energy Infrastructure	Concern raised regarding the impact of the policy requirements, including high standards relating to energy infrastructure, on viability of development. Additionally, it was questioned whether the evidence justifies the ambitious standards. The Written Ministerial Statement (2023) was raised in some of the representations, pointing out that there is no expectation to set local energy efficiency standards going beyond current or planned building regulations. Possible conflict with the definition of regulated embodied carbon outlined in policy EM1 was highlighted. Potential conflict of part 8(a) with GDPR was raised. Support received regarding the requirement to include significant renewable energy generation in new developments, and community energy schemes.
Policy EM12 - Reducing operational carbon in new build non-residential development	A request for more flexibility regarding specific measures for improvements on Part L emission rates. More detail on methodology was requested. Comments of support for mutual benefit received.
Policy EM13 - Overheating in new buildings	Some observations regarding site constrains and possible differences in effectiveness hierarchy were received. Concerns raised over the acceptability of specific assessments.

Policy EM14 - Embodied carbon and waste	Support received regarding minimisation of waste and prioritization of waste prevention and reuse. Concern raised regarding a single target being potentially under ambitious or overly challenging depending on the development; and the requirement for a whole-life carbon assessment being required for all major developments being disproportionate. Clarification was requested regarding how to demonstrate compliance with planning for a building's end of life.
Policy EM15 - Noise	Observations received regarding expected amenity levels being different in various parts of the city.
Overarching comments (non-policy)	Offer of cooperation received to further green the city. A request to add a policy to safeguard against development where a supply of minerals is present.
	Chapter 14 – Coventry City Centre
Policy CC1 – Coventry City Centre Development Strategy	An amendment to include references to the reduction of crime and fear of crime was received. Supportive comments received regarding sustainable drainage and the Water Framework Directive.
	Chapter 15 - Infrastructure Delivery, Implementation and Monitoring
Policy IM1 - Developer Contributions for Infrastructure	Comments received raising issues with the infrastructure contributions interfering with the provision of affordable housing. Specific references to crime, safety and emergency services, as well as health infrastructure and funding were requested. Adding explicit references to monitoring and housing supply was requested. Supportive comments received regarding provision of necessary infrastructure.
Overarching comments (non-policy)	Issue raised with the monitoring method. Comments received regarding the necessity of key milestones for water waste infrastructure, foul drainage hierarchy and the Water Company consultations in amber and red areas.
General comments (not submitted as policy specific)	Some comments were received outlining that the proposed housing numbers are too low, with some arguing the opposite. Addressing 35% uplift and lack of a Green Belt Review, as well as using a non-standard calculation method; proceeding under transitional arrangement and raising Plan period, and Duty to Cooperate concerns were highlighted issues. Additionally, attention was brought to new government guidance regarding BNG and LNRS, and their potential impact on the Local Plan. Comments regarding need for further addressing the needs of vulnerable communities, fighting against climate change and flooding. More focus should be put on attracting new industries,

	ensuring affordability and improving granular infrastructure, as well as congestion, especially when it comes to new developments. Infrastructure planning should be prioritised, including healthcare, addressing road congestion and school capacity issues. Arguments were raised towards releasing more land from Green Belt, however arguments for returning land to Green Belt were also made. Review of Longford's conservation status was requested. It was requested that a new policy CC2 is created. Sustainable development of universities noted. Some comments were put forward regarding concerns in relation to consistency with the national heritage policy, i.e. ensuring that brownfield land is prioritised for redevelopment for employment purposes. Some sites were put forward for promotion. Active travel being strengthened by policies was noted and approved with an encouragement towards changes to phrasing in order to put greater priority for walking, cycling and public transport was noted. The opportunity for growth promotion is encouraged by some representations. Positive comments were received regarding the soundness of the plan. Proposals to improve health provision were regarded positively and close collaboration with the NHS ICB was encouraged. Public transport links to healthcare services and the importance of non-physical aspects of health improvements (air quality, green spaces, etc) were highlighted. It was proposed that policy GB1 should be split into two parts and a list of sites should be removed, however the brownfield first approach should remain. Concern was raised over the Eastern Green SUE, naming of "protected green spaces", possibility of areas of high ecological importance being built on, oversaturation of student accommodation, ambitious active transport proposals and possible boundary review for Allesley Parish not being acknowledged. Additionally, lack of consideration of wildlife, green infrastructure and biodiversity was objected to. Objections received regarding taking Warwickshire's unmet housing need if Coventry's Green Belt would be used. Overprovision of housing in Eastern Green and Keresley SUEs, inadequate drainage system for the Richborough Estates as well as lack of a masterplan for Keresley and access systems to the SUEs were raised as concerns.
Appendices	Concern raised over an Appendix referencing NPPF 2023. Issue raised over the lack of ambitiousness for cycle parking; car parking

	ratios with dwellings; and monitoring not being effective. An issue was raised with too much car parking being provided for staff. It was questioned if the provision of adequate healthcare infrastructure would be sufficient. Cooperation to better understand and clarify points in the Infrastructure Development Plan was offered.

Sustainability appraisal key issue summary	
Sustainability Appraisal	Concerns were raised regarding whether the SA sufficiently considers the impact of the chosen housing requirement, site allocation strategy and the failure to deliver the housing need; as well as failure to consider a dispersed housing strategy. Some concerns were raised regarding the evidence; consideration of environmental impacts on Local Wildlife Sites and Potential Local Wildlife Sites and allocation of sites in Green Belt. Some issues were raised regarding effective protection of sustainability on allocated sites and provision of BNG, as well as reviewing brownfield sites for employment use. Some observations were received regarding the need for traffic control measures. A Green Belt Review and subsequent revised SA were requested.
HRA Screening Report	Some representors have raised issues with the accuracy of the report, including use of terms, hydrological links with the Severn Estuary, and main rivers. Some representors provided general comments in support of the report's conclusions regarding Conservation and Protection areas.

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Housing supply 2021/22 to 2040/41

Supply type	Past	1-5 (25/26 to 29/30)	6-10 (30/31 to 34/35)	11+ (35/36 to 40/41	Total
Past completions	**7,972**	**0**	**0**	**0**	**7,972**
Completions 2021/22	*3,818*	*0*	*0*	*0*	*3,818*
Completions 2022/23	*1,674*	*0*	*0*	*0*	*1,674*
Completions 2023/24	*1,859*	*0*	*0*	*0*	*1,859*
Completions 2024/25	*621*	*0*	*0*	*0*	*621*
Commitments	**0**	**7,779**	**4,055**	**1,707**	**13,541**
Under construction	*0*	*5,026*	*385*	*0*	*5,411*
Detailed consent	*0*	*2,714*	*920*	*0*	*3,634*
Permitted development	*0*	*(128)*	*0*	*0*	*(128)*
Outline consent	*0*	*167*	*2,750*	*1,707*	*4,624*
Identified capacity (without consent)	**0**	**54**	**3,297**	**3,449**	**6,800**
Allocations adopted 2017	*0*	*50*	*1,172*	*500*	*1,722*
Allocations proposed 2024	*0*	*0*	*1,825*	*2,825*	*4,650*
Additional capacity identified in HELAA 2024	*0*	*4*	*300*	*124*	*428*
Total identified supply (excl. completions)	**0**	**7,833**	**7,352**	**5,156**	**20,341**
Windfall allowance at 200 p/a	**0**	**400**	**1,000**	**1,200**	**2,600**
Total supply excl. completions	**0**	**8,233**	**8,352**	**6,356**	**22,941**
Total supply 2021-41	**7,972**	**8,233**	**8,352**	**6,356**	**30,913**

Simplified table

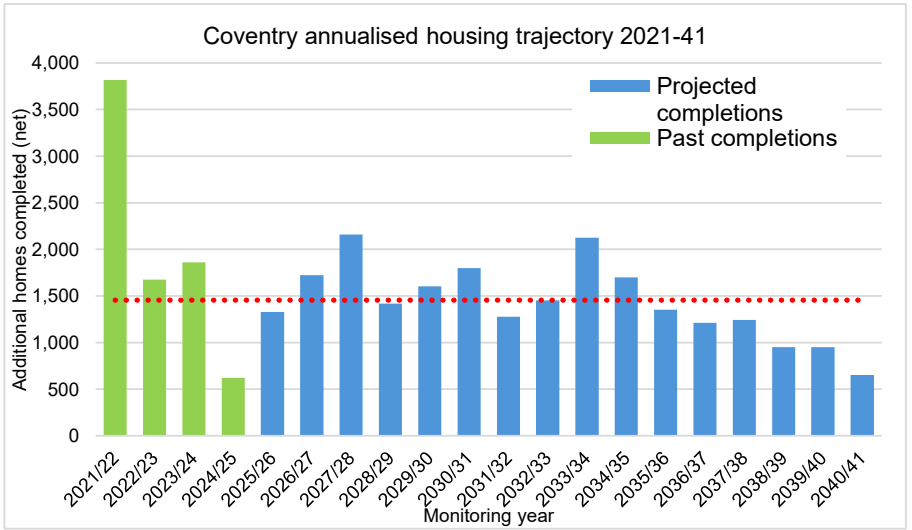
Housing land supply component	Dwellings
Past net completions 21/22 to 24/25	7,972
Committed supply	13,541
Remaining allocations (2017 Local Plan)	1,722
Proposed allocations (Local Plan Review)	4,650
Other identified sites (HELAA)	428
Windfall allowance	2,600
TOTAL	**30,913**

HEDNA need + 5% (1455 p/a + 5%)	30,555
Standard method need + 5% (1388 p/a + 5%)	29,148
5YHLS at 1528 p/a (1455 + 5%)	5.39

Housing supply type	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41
Past completions																				
Gross new build	3,447	1,426	1,430	621	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Net conversions & change of use	520	252	432	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Demolitions	-149	-4	-3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Projections (net)																				
Under construction	0	0	0	0	1,311	1,223	1,407	553	532	355	30	0	0	0	0	0	0	0	0	0
Detailed consent	0	0	0	0	29	467	908	600	710	341	250	241	50	38	0	0	0	0	0	0
Outline consent	0	0	0	0	0	0	1	65	101	467	393	452	1,036	402	302	301	301	301	301	201
Permitted development	0	0	0	0	-10	34	-158	0	6	0	0	0	0	0	0	0	0	0	0	0
Adopted Allocations remaining capacity (no permission)	0	0	0	0	0	0	0	0	50	197	200	225	250	300	225	125	150	0	0	0
Proposed Allocations remaining capacity (no permission)	0	0	0	0	0	0	0	0	0	122	155	303	515	730	575	550	550	450	450	250
Identified HELAA sites remaining capacity (no permission)	0	0	0	0	0	0	0	0	4	116	50	31	73	30	49	35	40	0	0	0
Small site windfall allowance	0	0	0	0	0	0	0	200	200	200	200	200	200	200	200	200	200	200	200	200
Totals																				
Past completions 2021/22 to 30/09/2024	3,818	1,674	1,859	621	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Projected completions 2024-2041	0	0	0	0	1,330	1,724	2,158	1,418	1,603	1,798	1,278	1,452	2,124	1,700	1,351	1,211	1,241	951	951	651
Projected cumulative completions (2021-2041)	**3,818**	**5,492**	**7,351**	**7,972**	**9,302**	**11,026**	**13,184**	**14,602**	**16,205**	**18,003**	**19,281**	**20,733**	**22,857**	**24,557**	**25,908**	**27,119**	**28,360**	**29,311**	**30,262**	**30,913**
HEDNA annualised need	1,455	1,455	1,455	1,455	1,455	1,455	1,455	1,455	1,455	1,455	1,455	1,455	1,455	1,455	1,455	1,455	1,455	1,455	1,455	1,455
Cumulative local housing need (1455 p/yr)	1,455	2,910	4,365	5,820	7,275	8,730	10,185	11,640	13,095	14,550	16,005	17,460	18,915	20,370	21,825	23,280	24,735	26,190	27,645	29,100
Cumulative +/- delivery vs need	2,363	2,582	2,986	2,152	2,027	2,296	2,999	2,962	3,110	3,453	3,276	3,273	3,942	4,187	4,083	3,839	3,625	3,121	2,617	1,813

5YHLS 2025-30	Qty	+5% buffer
Local housing need 2021-2041*	29,100	30,555
Net completions 2021-25	7,972	7,972
Remaining need 2025-41	21,128	22,583
Remaining annualised need 2024-41	1,321	1,387
5-year need 2025-2030	6,605	6,935
Deliverable supply 2025-2030	8,233	8,233
5-year housing land supply 2025/26-2030/31	**6.23**	**5.94**

*Housing need of 1455 per annum based on HEDNA



Identified housing capacity at 31/03/2025

No.	Supply type	Policy ref	Site name	Ward	Remaining capacity	Forecast															
						2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41
1	Allocation	H2:03	Walsgrave Hill Farm	HEN	**700**	0	0	0	0	50	75	100	100	100	100	100	75	0	0	0	0
2	Allocation	H2:06	Land at Browns Lane	BAB	**475**	0	0	0	0	0	25	50	50	50	50	50	50	150	0	0	0
3	Allocation	H2:15	Land at Sandy Lane	RAD	**250**	0	0	0	0	0	50	50	50	50	50	0	0	0	0	0	0
4	Allocation	H2:01	Keresley SUE	BAB	**175**	0	0	0	0	0	0	0	25	50	50	50	0	0	0	0	0
5	Allocation	H2:19	Land at Mitchell Avenue	WAI	**50**	0	0	0	0	0	0	0	0	0	50	0	0	0	0	0	0
6	Allocation	H2:22	Land at Jardine Crescent	WOO	**25**	0	0	0	0	0	0	0	0	0	0	25	0	0	0	0	0
7	Allocation	H2:21	Woodfield School Site, Stoneleigh Road	WAI	**24**	0	0	0	0	0	24	0	0	0	0	0	0	0	0	0	0
8	Allocation	H2:12	LTI Factory, Holyhead Road	SHE	**23**	0	0	0	0	0	23	0	0	0	0	0	0	0	0	0	0
9	Proposed Allocation	H2:38	Friargate – Land bounded by Railway, Grosvenor Road, Manor Road and including Greyfriars Green and Station	STM	**1350**	0	0	0	0	0	0	0	0	200	200	150	200	200	200	200	0
10	Proposed Allocation	H2:26	Coventry Central Police Station, Little Park Street	STM	**600**	0	0	0	0	0	0	0	100	100	100	100	100	100	0	0	0
11	Proposed Allocation	H2:36	Land at Spon End	SHE	**437**	0	0	0	0	0	62	75	75	75	75	75	0	0	0	0	0
12	Proposed Allocation	H2:32	Dale Buildings, Tower Street	STM	**200**	0	0	0	0	0	0	0	100	100	0	0	0	0	0	0	0
13	Proposed Allocation	H2:30	Whitefriars Street Car Park	STM	**185**	0	0	0	0	0	0	0	0	0	185	0	0	0	0	0	0
14	Proposed Allocation	H2:27	New Union Street Car Park	STM	**170**	0	0	0	0	0	0	0	0	0	170	0	0	0	0	0	0
15	Proposed Allocation	H2:29	Former Vintage House, St Nicolas Street / Leicester Row	RAD	**100**	0	0	0	0	0	50	50	0	0	0	0	0	0	0	0	0
16	Proposed Allocation	H2:34	Former Chace School, Chace Avenue	BIN	**60**	0	0	0	0	0	10	30	20	0	0	0	0	0	0	0	0
17	Proposed Allocation	H2:33	The Allesley Hotel, Birmingham Road	BAB	**48**	0	0	0	0	0	0	0	8	40	0	0	0	0	0	0	0
18	HELAA/SHLAA	TBC	Northern Regeneration Area	STM	**1500**	0	0	0	0	0	0	0	0	0	0	250	250	250	250	250	250
19	HELAA/SHLAA	STM-017-24	Bishop Street/Tower Street	STM	**129**	0	0	0	0	0	0	10	30	30	30	29	0	0	0	0	0
20	HELAA/SHLAA	WYK-002-24	Land at Attoxhall Road	WYK	**63**	0	0	0	0	0	63	0	0	0	0	0	0	0	0	0	0
21	HELAA/SHLAA	FOL-002-24	Burbidge and Son South Side Of Awson	FOL	**63**	0	0	0	0	0	0	10	30	23	0	0	0	0	0	0	0
22	HELAA/SHLAA	FOL-007-24	Newfield House, Kingfield Road	FOL	**50**	0	0	0	0	0	0	0	0	0	0	0	10	40	0	0	0
23	HELAA/SHLAA	WOO-001-23	Former Faseman House, Faseman	WOO	**50**	0	0	0	0	0	0	10	20	20	0	0	0	0	0	0	0
24	HELAA/SHLAA	FOL-001-24	146-164 Lockhurst Lane/Livingstone Rd	FOL	**45**	0	0	0	0	0	0	0	0	0	0	20	25	0	0	0	0
25	HELAA/SHLAA	HEN-001-23	Land at Caradoc Close, Henley,	HEN	**30**	0	0	0	0	0	10	20	0	0	0	0	0	0	0	0	0
26	HELAA/SHLAA	LON-002-24	Land at Roseberry Avenue	LON	**10**	0	0	0	0	0	10	0	0	0	0	0	0	0	0	0	0
27	HELAA/SHLAA	STM-006-24	Lansdowne Street	STM	**8**	0	0	0	0	0	8	0	0	0	0	0	0	0	0	0	0
28	HELAA/SHLAA	EAR-001-24	Wisteria Lodge Earlsdon	EAR	**8**	0	0	0	0	0	8	0	0	0	0	0	0	0	0	0	0
29	HELAA/SHLAA	WYK-001-23	The Bungalow, Dorchester way	WYK	**5**	0	0	0	0	0	5	0	0	0	0	0	0	0	0	0	0
30	HELAA/SHLAA	BAB-023-24	Land off Park Hill Lane	BAB	**5**	0	0	0	0	0	5	0	0	0	0	0	0	0	0	0	0
31	HELAA/SHLAA	FOL-006-24	2 Lewis Road	FOL	**4**	0	0	0	0	4	0	0	0	0	0	0	0	0	0	0	0

No.	Supply type	Policy ref	Site name	Ward	Remaining capacity	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41
32	HELAA/SHLAA	FOL-009-24	Bridge Street	FOL	**4**	0	0	0	0	0	4	0	0	0	0	0	0	0	0	0	0
33	HELAA/SHLAA	FOL-003-24	Silverton Road	FOL	**3**	0	0	0	0	0	3	0	0	0	0	0	0	0	0	0	0
34	HELAA/SHLAA	WOO-002-24	Land at Ferrers Close	WOO	**-49**	0	0	0	0	0	0	0	-49	0	0	0	0	0	0	0	0
		Total			6800	0	0	0	0	54	435	405	559	838	1060	849	710	740	450	450	250

Housing Commitments at 31/03/2025 (dwelling equivalent figures used for non-C3 accomodation)

Ordered by: Status > Suppy type > Remaining capacity

										Forecast															
No.	Planning app	Decision date	Location	Proposal	Status	Supply type	Dev type	Tenure type	Remaining capacity	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41
1	RMM/2022/1982	21/12/2023	Land At Thompsons Farm Thompsons Road	Submission of reserved matters (appearance, landscaping, layout and scale) for the erection of 328o. dwellings and associated infrastructure pursuant to planning permission OUT/2019/0484 granted on 05/07/2022 (...)	Under construction	Allocation	NB	Residential	**324**	96	25	75	100	28	0	0	0	0	0	0	0	0	0	0	0
2	RM/2020/2399	29/11/2021	Land bounded by Hall Brook, Bennetts Rd South, Sandpits Lane and Tamworth Rd	Submission of reserved matters (layout, internal access arrangements, scale, appearance and landscaping) for Phases 2A and 2B comprising 394 dwellings, pursuant to outline permission OUT/2014/2282. The outline application was accompanied by an Environmental Statement.	Under construction	Allocation	NB	Residential	**294**	50	50	50	50	44	50	0	0	0	0	0	0	0	0	0	0
3	PL/2023/000188 8/RESM	10/06/2024	Land Between Bennetts Road And Fivefield Road	Submission of Reserved Matters for 290no. dwellings for all matters outstanding pursuant to permission OUT/2022/0712 for the demolition of all existing buildings (save for Poddy Cottage) and the erection of up to 290 dwellings (...)	Under construction	Allocation	NB	Residential	**290**	50	50	50	50	50	40	0	0	0	0	0	0	0	0	0	0
4	RMM/2022/0633	11/03/2024	25 Fivefield Road, Coventry, CV7 8JE	[Phase 1] Submission of Reserved Matters for 280no. dwellings off Fivefield Road, for all matters outstanding pursuant to permission OUT/2019/0022 (...)	Under construction	Allocation	NB	Residential	**280**	50	50	50	50	50	30	0	0	0	0	0	0	0	0	0	0
5	PL/2024/000024 6/RESM	18/09/2024	Land Between Bennetts Road And Fivefield Road	Submission of reserved matters for 260no dwellings for all matters outstanding pursuant to planning permission OUT/2022/0713 granted on 25/03/2022 (...)	Under construction	Allocation	NB	Residential	**260**	50	50	50	50	50	10	0	0	0	0	0	0	0	0	0	0
6	PL/2023/000055 4/RESM	21/07/2023	Land At Pickford Green Lane	Submission of reserved matters (Appearance, Layout, Landscaping, Scale) for the erection of up to 250 dwellings (phase 1 of the Eastern Green SUE), pursuant to planning permission reference OUT/2018/3225 granted on 03/06/2021 (...)	Under construction	Allocation	NB	Residential	**245**	50	50	50	50	45	0	0	0	0	0	0	0	0	0	0	0
7	RMM/2019/3059	17/12/2021	Land to the west of Cromwell Lane	Reserved Matters for the approval of access, appearance, landscaping, layout and scale of a residential development of 240 dwellings including affordable housing and open space granted under Outline application OUT/2016/1874	Under construction	Allocation	NB	Residential	**240**	40	50	50	50	50	0	0	0	0	0	0	0	0	0	0	0
8	RMM/2022/0678	28/11/2024	Land At Tamworth Road, 25 Fivefield Road	Submission of Reserved Matters for 201no. dwellings off Tamworth Road, for all matters outstanding pursuant to permission OUT/2019/0022 granted on 7th February 2022 (...)	Under construction	Allocation	NB	Residential	**201**	50	50	50	51	0	0	0	0	0	0	0	0	0	0	0	0
9	RMM/2022/2615	21/12/2023	Land At Thompsons Farm Thompsons Road	Submission of Reserved Matters (appearance, landscaping, layout and scale) for the erection of 171no. dwellings and associated infrastructure pursuant to planning permission OUT/2019/0484 granted on 05/07/2022 (...)	Under construction	Allocation	NB	Residential	**168**	36	36	36	36	24	0	0	0	0	0	0	0	0	0	0	0
10	FM/2020/0668	28/05/2021	Land at Whitmore Park, Holbrook Lane	Demolition of existing factory buildings and development of 499 dwellings, including affordable homes (...)	Under construction	Allocation	NB	Residential	**167**	54	50	50	13	0	0	0	0	0	0	0	0	0	0	0	0
11	RMM/2022/1028	16/12/2022	Elm Fields Farm, Wigston Road	Reserved Matters consent relating to appearance, landscaping, layout and scale for the erection of 150 residential dwellings (Use Class C3) and associated works including the demolition of existing buildings	Under construction	Allocation	NB	Residential	**148**	148	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12	PL/2023/000122 5/RESM	14/12/2023	Land At Allard Way	Reserved matters application for the development of 125 dwellings, including appearance, landscaping, layout and scale.	Under construction	Allocation	NB	Residential	**125**	50	50	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	FUL/2021/2411	07/07/2022	Holbrook Lane	Erection of up to 223 residential dwellings with associated infrastructure and works, inclusive of the demolition of the existing buildings	Under construction	Allocation	NB	Residential	**124**	102	22	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	FUL/2020/1142	27/11/2023	Holyhead Road	Erection of 87no. dwellings (Use Class C3), together with access alterations, car parking, drainage, landscaping and associated works (Resubmission of FUL/2019/3193).	Under construction	Allocation	NB	Residential	**69**	30	30	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0

No.	Planning app	Decision date	Location	Proposal	Status	Supply type	Dev type	Tenure type	Remaining capacity	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41
15	FUL/2020/1059	01/07/2021	Land at Pickford Green Lane	Development of 115 dwellings including 25% affordable housing provision, and associated works and infrastructure including vehicular and pedestrian access and diversion of public right of way	Under construction	Allocation	NB	Residential	**47**	47	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16	FUL/2020/1992	15/12/2021	Land at Pickford Green Lane	Construction of 60 dwellings (including 25% affordable), internal roads, public open space, pumping station, landscaping and other ancillary works, including creation of a new vehicular and pedestrian access from Pickford Green Lane	Under construction	Allocation	NB	Residential	**2**	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	FUL/2022/3213	05/01/2023	Manor Farm, Bennetts Road South	Construction of one new dwelling with upgraded access and parking	Under construction	Allocation	NB	Residential	**1**	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	FUL/2020/2161	24/11/2020	Keresley Manor Tamworth Road		Under construction	Allocation	NB	Residential	**1**	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	RMM/2018/2246	28/11/2018	157 Corporation Street (Lamb Street, Chapel Street and Bishop Street) - PHASE 2	[PHASE 2] Part of wider hybrid application, this forms the PBSA development to the west of Chapel Street.	Under construction	CCAAP	NB	PBSA	**191**	0	0	0	0	0	191	0	0	0	0	0	0	0	0	0	0
20	FUL/2020/0640	13/08/2020	152 Far Gosford Street	Proposed demolition of existing Restaurant (Use Class A3) and associated outbuildings and construction of proposed new development comprising 60no. student studio apartments (Sui Generis) split between two blocks with a flexible retail unit (Use Class A1, A3 or A5) to the ground floor street frontage.	Under construction	CCAAP	NB	PBSA	**60**	0	0	0	0	60	0	0	0	0	0	0	0	0	0	0	0
21	FUL/2021/1325	18/06/2021	49 Primrose Hill Street	Proposed part demolition of vacant Public House (A4) and redevelopment to provide new student accommodation building with 59 bedrooms (in 8 clusters), associated living accommodation and amenity space. (Resubmission of FUL/2018/0453)	Under construction	CCAAP	NB	PBSA	**25**	0	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22	PL/2023/000186 9/FULM	18/06/2024	Land At Isadora Lea	Erection of 93 residential dwellings (Use Class C3), including access off Isadora Lea and Marjorie Way, with associated public open space, landscaping and supporting infrastructure.	Under construction	Proposed Allocation	NB	Residential	**93**	46	45	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	PL/2023/000093 6/RESM	15/12/2023	The Sphinx Club Sphinx Drive	Reserved Matters application for appearance, landscaping, layout, scale for (up to) 196 dwellings, plus associated infrastructure pursuant to planning permission APP/U4610/W/21/3288560 (OUT/2021/0104) granted on 21/12/2022 (...)	Under construction	HELAA/SH LAA	NB	Residential	**196**	25	50	50	50	21	0	0	0	0	0	0	0	0	0	0	0	0
24	FUL/2018/1713	23/09/2019	Land at junction of Harper Road and Humber Avenue	Demolition of vacant industrial unit and erection of 5 storey building comprising 67 flats totalling 87 student bedrooms with associated communal facilities, car parking, cycle parking and landscaping	Under construction	HELAA/SH LAA	NB	PBSA	**64**	0	0	0	0	64	0	0	0	0	0	0	0	0	0	0	0	0
25	FUL/2019/3114	14/05/2021	Land at Well Street and Bishop St	Erection of a new build 5 storey mixed use development to provide commercial space (A1/A2/A3/A4/B1 use class) at ground floor and 40 residential units on the upper floors. A rear courtyard is to provide 17 car parking spaces, to be accessed from Well Street, with associated landscaping.	Under construction	HELAA/SH LAA	NB	Residential	**40**	0	0	0	0	0	10	30	0	0	0	0	0	0	0	0	0	0
26	FUL/2019/3027	25/03/2020	The O'Brian Building, Foleshill Road and adjoining curtilage	Proposed conversion of a mixed use building to 24 one and two bed apartments, including 4 'live-work' apartments, with the erection of an additional storey of accommodation and demolition of single storey rear extension and provision of car parking	Under construction	HELAA/SH LAA	NB	Residential	**24**	0	24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

No.	Planning app	Decision date	Location	Proposal	Status	Supply type	Dev type	Tenure type	Remaining capacity	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41
27	FUL/2018/0153	13/11/2020	Land adjacent 624 Stoney Stanton Road	Erection of three storey building comprising 16 flats with associated access, parking and landscaping	Under construction	HELAA/SHLAA	NB	Residential	**16**	0	16	0	0	0	0	0	0	0	0	0	0	0	0	0	0
28	FUL/2019/3081	07/06/2021	Land Adjacent to 49 and 51 Corporation Street	Change of use from a public house to mixed use workshop, performance and conference space (sui generis) and renovation of existing apartment at rear creating 2 apartments. The erection of five storey mixed use extension to include one restaurant/public house unit (sui generis) at ground floor level and 14 apartments above. Development of the remaining open space, improving the setting of the church opposite and the new active elevation created.	Under construction	HELAA/SHLAA	NB	Residential	**15**	0	0	0	0	0	15	0	0	0	0	0	0	0	0	0	0
29	FUL/2020/1534	16/02/2022	35-37 Whitefriars Gate Much Park St	The repair and conversion of the existing Listed Gatehouse to provide residential accommodation; internal alterations to the reconstructed Rose Inn Building to provide office / retail accommodation (Class E (g) (i) and Class E (a, b and c); Construction of an infill building between the north gable end of the Gatehouse and the west gable end of the Rose Inn Building; Construction of a new 'L' shape 2 and 3 storey wing from the south gable end of the Gatehouse to accommodate residential units for the adjacent University.	Under construction	HELAA/SHLAA	CON	PBSA	**14**	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	FM/2022/0980	06/12/2022	Land At Avon House Swift House And Welland House Longwood Close	Demolition of existing buildings and construction of student accommodation (sui-generis), co-living accommodation (sui-generis), commercial, business and service accommodation (class E) [retail], car parking, landscaping and associated works.	Under construction	Windfall	COU	Resi/PBSA mix	**793**	0	400	393	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31	PL/2023/0000654/FULM	08/03/2024	Progress House Westwood Way	Demolition of existing office building and erection of new building comprising student accommodation (Use Class Sui Generis) and commercial, business and service accommodation (Use Class E), amenity spaces, car parking, landscaping and associated works	Under construction	Windfall	NB	PBSA	**366**	0	0	366	0	0	0	0	0	0	0	0	0	0	0	0	0	0
32	FUL/2022/0583	24/07/2023	Brookside House Burnsall Road	Demolition of existing industrial building and erection of purpose built student accommodation (196 Rooms), amenities, landscaping, access and associated works	Under construction	Windfall	NB	PBSA	**196**	196	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
33	RMM/2022/2337	24/03/2023	Bruker UK Banner Lane	Submission of reserved matters under Condition 1 details of appearance, landscaping, and layout for 120 dwellings and demolition of existing Bruker UK HQ facility pursuant to planning permission OUT/2020/2438 granted on 17th July 2022. | Historic Reference: OUT/2020/2438	Under construction	Windfall	NB	Residential	**117**	50	50	17	0	0	0	0	0	0	0	0	0	0	0	0	0
34	RMM/2020/3151	16/06/2021	Land East Of Brade Drive	Submission of reserved matters for landscaping only in respect of application OUT/2017/3156 granted on 16/08/19 for residential development of 28 bungalows - outline application seeking approval of access, appearance, layout and scale.	Under construction	Windfall	NB	Residential	**28**	10	10	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0
35	FUL/2018/2444	21/01/2019	367 Foleshill Road	Rebuild for ground floor restaurant and upper floors residential apartments.	Under construction	Windfall	NB	Residential	**24**	0	0	24	0	0	0	0	0	0	0	0	0	0	0	0	0	0
36	FUL/2022/0178	24/03/2022	Land adjacent St Patricks Church Deedmore Road	Erection of 21 affordable residential dwellings and associated works including access and landscaping	Under construction	Windfall	NB	Residential	**21**	10	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
37	FUL/2020/2684	21/12/2021	Reform Church, Harefield Road	Demolition of existing building and erection of 18 apartments for assisted living (C3) within two development blocks with associated parking and landscaping.	Under construction	Windfall	NB	Residential	**18**	0	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
38	FUL/2018/3286	23/05/2019	75-77 Albany Road	Demolition of existing retail buildings and erection of 15(no.) 1bed flats.	Under construction	Windfall	NB	Residential	**15**	0	0	0	0	15	0	0	0	0	0	0	0	0	0	0	0	0

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39	FUL/2020/0617	26/05/2021	The Old Police Station 519 Tile Hill Lane	Demolition of existing Police Station and erection of 2no. 3no. storey buildings & 2no, detached houses. 1no. building containing 5no. 1no. bedroom flats; 1no. building containing 6no. 2no. bedroomed flats & 2no. 2no bedroomed detached houses (Resubmission FUL/2018/2914 & FUL/2019/2910).	Under construction	Windfall	NB	Residential	**13**	0	0	0	3	10	0	0	0	0	0	0	0	0	0	0	0
40	FUL/2020/0382	07/05/2020	St Marys Church Hall Athol Road	Erection of building to provide nine apartments	Under construction	Windfall	NB	Residential	**9**	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
41	FUL/2019/0548	29/05/2019	116 Humber Road	Demolition of existing builders yard and erection of 9(no.) studio flats.	Under construction	Windfall	NB	Residential	**9**	0	0	0	0	9	0	0	0	0	0	0	0	0	0	0	0
42	FUL/2021/2968	22/03/2022	18 Regent Street	Change of use from dwelling to 10 studio flats and the erection of a rear extension	Under construction	Windfall	CON	Residential	**9**	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
43	FUL/2014/4231	09/03/2015	1a Sydnall Road	Demolition of existing commercial launderette and erection of 9 flats	Under construction	Windfall	NB	Residential	**9**	0	0	0	0	0	9	0	0	0	0	0	0	0	0	0	0
44	FUL/2022/1288	08/09/2022	57 Ansty Road	Demolition of existing residential dwelling and outbuildings and erection of 9 new build dwellings including associated access and landscaping works	Under construction	Windfall	NB	Residential	**8**	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
45	FUL/2021/2574	11/11/2021	Magnolia View, Wall Hill Road	Change of use from Sui Generis (dog training/kennels) to C3 (the erection of 8 dwellings plus one replacement garage).	Under construction	Windfall	COU	Residential	**8**	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
46	FUL/2020/0178	18/03/2020	103 Holyhead Road	Demolition of existing outbuilding and erection of a two-storey building comprising 8 flats and relocation of windows in the rear elevation	Under construction	Windfall	NB	Residential	**8**	0	0	0	0	8	0	0	0	0	0	0	0	0	0	0	0
47	FUL/2017/0850	25/07/2017	Land to the rear of 77-91 Alder Road	Erection of 4 semi-detached dwellings with associated parking, gardens and landscaping	Under construction	Windfall	NB	Residential	**4**	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0
48	FUL/2018/1040	03/10/2018	473 Sewall Highway	Alterations and extension to form 4(no.) self-contained flats.	Under construction	Windfall	NB	Residential	**4**	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
49	FUL/2018/0783	25/10/2018	r/o Albany Road	Demolition of exisitng builders yard buildings and erection of 2(no.) dwellings.	Under construction	Windfall	NB	Residential	**4**	0	0	0	0	4	0	0	0	0	0	0	0	0	0	0	0
50	PL/2022/000022 3/FULM	23/02/2023	Jer 4x4, The Piggeries Wall Hill Road	Demolition of existing vehicle sales and repairs workshops and associated buildings and erection of three dwellings (Resubmission of FUL/2020/1708- the current application alters the access into the site)	Under construction	Windfall	NB	Residential	**3**	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
51	FUL/2022/1994	04/11/2022	36 Providence Street	Proposed alterations to change existing Dwelling House into 4no. Residential Apartments	Under construction	Windfall	CON	Residential	**3**	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
52	FUL/2019/0926	10/06/2019	58 Brighton Street	Demolition of garages and erection of 3(no.) flats.	Under construction	Windfall	NB	Residential	**3**	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
53	FUL/2021/0582	28/05/2021	15 Shakespeare Street	Change of use from mixed use retail and residential to 6 No. person House in Multiple Occupation, two storey and part single storey side and rear extensions, hip to gable roof extension and box dormer on rear roof, and associated boundary wall, parking and access	Under construction	Windfall	COU	HMO	**3**	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
54	PL/2022/000012 5/FUL	27/03/2023	59 Ullswater Road	Demolition of bungalow and erection of 3 dwellings, garages and associated parking.	Under construction	Windfall	NB	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
55	PL/2023/000125 2/FUL	16/08/2023	Allisons Butchers, 82-84 Standard Avenue	Change of use of building to form four flats including both side and rear extensions.	Under construction	Windfall	COU	Residential	**2**	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
56	FUL/2019/2876	20/01/2020	5 Arbury Avenue	Demolition of existing garages and erection of two dwelling houses	Under construction	Windfall	NB	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
57	FUL/2020/1480	30/01/2021	28 Stivichall Croft	Erection of two 5 bedroom detached houses.	Under construction	Windfall	NB	Residential	**2**	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0
58	FUL/2022/1337	28/07/2022	Harvest Hill Farm Oak Lane	Conversion of barn from mixed use to residential (Use Class C3) with associated alterations	Under construction	Windfall	COU	Residential	**1**	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
59	FUL/2021/0433	20/05/2021	45 Hawkes Mill Lane	Erection of a new dwelling	Under construction	Windfall	NB	Residential	**1**	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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60	FUL/2021/2039	24/09/2021	18 Delage Close, CV6 6JP	Change of use from a single dwellinghouse (Use Class C3) to two, one bedroomed flats (Use Class C3) (Resubmission of FUL/2021/0068).	Under construction	Windfall	CON	Residential	**1**	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
61	FUL/2020/1605	16/06/2020	60 Blackwatch Road	Erection of new attached dwelling with garage and demolition of existing outbuilding	Under construction	Windfall	NB	Residential	**1**	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
62	FUL/2021/3395	03/10/2022	Land at Meadow Road	Demolition of No.79 & No.81 Meadow Road and erection of 54no. dwellings with associated landscaping, car parking and new access.	Under construction	Windfall	NB	Residential	**0**	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
63	FUL/2020/2279	21/01/2021	Milverton Gates Care Home Dawson Road	Change of use from care home (Use Class C2) to apartments (Use Class C3).	Under construction	Windfall	COU	Resi/care	**0**	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
64	FUL/2020/0748	19/12/2024	Land at Bennetts Road and Penny Park Lane	Erection of 388no. dwellings (C3), public open space, landscaping, drainage attenuation areas, access from Bennetts Road and Penny Park Lane, access roads, land safeguarded for a new Link Road, and other associated works. This application is accompanied by an Environmental Statement.	Detailed consent	Allocation	NB	Residential	**388**	0	0	50	50	50	50	50	50	50	38	0	0	0	0	0	0
65	OUT/2021/3576	16/10/2023	Former Transco Site, Abbotts Lane	Full planning application for 212 dwellings (Class C3) served via access from Abbotts Lane and Upper Hill Street; strategic landscaping and earthworks; temporary car parking; surface water drainage and all other ancillary and enabling works. Outline planning application for new residential development upto 478 units (Class C3); ancillary Class E development up to 950sqm of floorspace; strategic landscaping and earth works; surface water drainage and all other ancillary infrastructure and enabling site works with means of access to be taken from the connections from Abbotts Lane and Upper Hill Street (part of the full application) for consideration; all other matters (layout, appearance, scale and landscaping) reserved for subsequent approval.	Detailed consent	Allocation	NB	Residential	**212**	0	0	12	100	100	0	0	0	0	0	0	0	0	0	0	0	0	0
66	PL/2023/000235 9/RESM	18/10/2024	Whitley Pumping Station London Road	Submission of Reserved Matters for details of appearance, layout, scale and landscaping of 149 new dwellings with public open space, drainage, car parking and other associated works pursuant to planning permission OUT/2020/2521 for Hybrid planning application comprising: 1) Outline planning for erection of up to 195no dwellings (Use Class C3), new vehicular access onto London Road with associated access works, parking, landscaping and ancillary works. All matters reserved except access. 2. Full planning for the renovation of the existing Lodge Building to provide one dwelling house (Use Class C3); Change of use of the existing Pump House to provide four flats (Use Class C3), associated access works, parking, landscaping and ancillary works granted 12/05/2023	Detailed consent	Allocation	NB	Residential	**149**	0	50	50	49	0	0	0	0	0	0	0	0	0	0	0	0	0	0
67	RMM/2022/0636	27/10/2023	25 Fivefield Road	Submission of Reserved Matters for 35no. dwellings off Keresley Link Road, for all matters outstanding pursuant to permission OUT/2019/0022 granted on 7th February 2022 for the demolition of all existing buildings and the erection of up to 550 dwellings, and creation of associated vehicular accesses to Tamworth Road and Fivefield Road, pedestrian/cycle and emergency accesses, highway improvements to Fivefield Road, parking, landscaping, drainage features, open space and associated infrastructure, with all matters to be reserved except access points into the site.	Detailed consent	Allocation	NB	Residential	**35**	0	5	10	10	10	0	0	0	0	0	0	0	0	0	0	0	0	0

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68	RM/2022/0679	20/09/2024	Tamworth Road	Submission of Reserved Matters for 18no. dwellings off Tamworth Road, for all matters outstanding pursuant to permission OUT/2019/0022 granted on 7th February 2022 for the demolition of all existing buildings and the erection of up to 550 dwellings, and creation of associated vehicular accesses to Tamworth Road and Fivefield Road, pedestrian/cycle and emergency accesses, highway improvements to Fivefield Road, parking, landscaping, drainage features, open space and associated infrastructure, with all matters to be reserved except access points into the site | Historic Reference: OUT/2019/0022	Detailed consent	Allocation	NB	Residential	**19**	0	10	9	0	0	0	0	0	0	0	0	0	0	0	0	0
69	PL/2023/000264 9/RESM	07/11/2024	401 London Road	Submission of reserved matters in respect of application reference OUT/2020/2882, granted on 16/09/2021 for Outline application (with all matters reserved except access): for erection of up to 24 dwellings with car parking, served off the existing accesses.	Detailed consent	Allocation	NB	Residential	**14**	0	0	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
70	OUT/2020/2521	12/05/2023	Whitley Pumping Station London Road	Hybrid planning application comprising: 1) Outline planning for erection of up to 195no dwellings (Use Class C3), new vehicular access onto London Road with associated access works, parking, landscaping and ancillary works. All matters reserved except access. 2. Full planning for the renovation of the existing Lodge Building to provide one dwellinghouse (Use Class C3); Change of use of the existing Pump House to provide four flats (Use Class C3), associated access works, parking, landscaping and ancillary works.	Detailed consent	Allocation	NB	Residential	**5**	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
71	PL/2024/000090 6/RVC	12/08/2024	Former Gala Bingo Fairfax Street	Erection of co-living accommodation (student and non-student) ancillary facilities and amenity (sui generis use) and 693sqm of commercial use (Use Class E (a), (b), (c) and sui generis hot food takeaway, drinking establishment or mixed use drinking establishment and restaurant/café) on ground floor together with associated parking and servicing infrastructure and landscaping. (Variation of condition No. 2 (plans); imposed on planning permission reference FUL/2020/1421 granted on 31/03/2022).	Detailed consent	CCAAP	NB	Residential	**420**	0	0	420	0	0	0	0	0	0	0	0	0	0	0	0	0	0
72	PL/2023/000076 3/FULM	21/11/2023	1 Lincoln Street	Application for erection of six storey residential (use Class C3) comprising 20 apartments, associated development and overflow car-parking.	Detailed consent	CCAAP	NB	Residential	**20**	0	0	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0
73	RM/2022/2875	20/12/2023	22-25 Cross Cheaping	Reserved Matters Submission to determine Access, Layout and Landscaping for the proposed Change of use from restaurant space on first and second floors to student accommodation and erection of additional two floors to be used for student accommodation following Outline Approval ref OUT/2019/1811 dated 20/02/2020.	Detailed consent	CCAAP	COU	PBSA	**19**	0	0	19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
74	FUL/2021/3812	05/04/2022	89b and 89c Far Gosford Street	Conversion of first floor of a shop into 2no. Flats	Detailed consent	CCAAP	COU	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
75	FUL/2021/3474	04/03/2022	Flat above 34 Far Gosford Street	Change of use from residential flat (C3) to light storage (B8)	Detailed consent	CCAAP	COU	Residential	**(1)**	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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76	PL/2023/0002533/RESM	04/03/2024	City Centre South Warwick Row	[Phase 1] Application for Reserved Matters Approval for approval of access, appearance, landscaping, layout and scale for Blocks A1, A2, B, C and E and associated public realm at City Centre South pursuant to Conditions 1 and 2 of hybrid planning application PL/2023/0002218/RVC for development of residential (Class C3) and mixed use non-residential floorspace including Class E Commercial, Business and Service uses, Class F.1 Learning and Non-Residential Institutions and Sui Generis Pub or Drinking Establishment / Hot Food Takeaway / Cinema uses, hard and soft landscaping and new public open space including sustainable urban drainage systems, car parking provision and formation of new pedestrian and vehicular access. Application includes details for part-discharge of the following conditions relating to CCS Phase 1: Conditions 6 [Design Brief], 7 [Phasing Programme], 8 [Landscape and Ecological Management Plan].	Detailed consent	Proposed Allocation	NB	Residential	**991**	0	0	0	200	200	200	200	191	0	0	0	0	0	0	0	0
77	PL/2023/0002576/RVC	31/05/2024	Paradise Street	Demolition of existing buildings, retention and enhancement of the City Wall Scheduled Monument, and erection of buildings up to a maximum height of lower and upper ground floors plus 18 storeys and plant, providing 303 residential dwellings (Use Class C3), and commercial, business and service (Use Class E) at ground level, with associated car parking, cycle parking, highways works, landscaping and other associated works.	Detailed consent	Proposed Allocation	NB	Residential	**303**	0	0	0	0	303	0	0	0	0	0	0	0	0	0	0	0	0
78	PL/2023/0002666/FULM	25/09/2024	St Nicholas Church Hall Sherwood Jones Close	Demolition of existing church and the redevelopment of the site to include for a proposed Residential Care Home (Use Class C2) with associated landscaping and carparking (Resubmission of PL/2023/0000437/FULM)	Detailed consent	HELAA/SHLAA	NB	Care	**20**	0	0	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0
79	PL/2022/0000129/FUL	06/03/2024	204-206 Longford Road	Conversion of Nos. 204 and 206 Longford Road with single-storey rear extensions and construction of new end of terrace building to provide 10 x 1-bedroom flats with associated parking and landscaping	Detailed consent	HELAA/SHLAA	CON	Residential	**8**	0	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
80	PL/2023/0000782/FUL	14/06/2023	Pearl Hyde Primary School Dorchester Way	Demolition of caretakers house (Use Class C3) and erection of a 4 bed children's home (Use Class C2).	Detailed consent	HELAA/SHLAA	COU	Residential	**(1)**	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
81	PL/2024/0001129/RESM	13/11/2024	Former Whem Development Site Deedmore Road [Phase 6]	Submission of reserved matters in respect of application reference R/2008/1801 granted on 22.10.2009 for demolition of existing housing and associated community and shopping facilities and erection of new dwelling houses and apartments (up to 3,328 units) with associated open space, local shopping facilities and drainage infrastructure and the stopping-up, diversion and creation of public highway (all matters reserved). This application relates to Phase 6 for 190 dwellings.	Detailed consent	Windfall	NB	Residential	**190**	0	50	50	50	40	0	0	0	0	0	0	0	0	0	0	0	0
82	PL/2023/0001191/FULM	21/03/2024	2 The Oaks Westwood Way	Demolition of existing education building (Use Class F1) and erection of an education building (Use Class F1) and Purpose Built Student Accommodation (Sui Generis) with amenity spaces, car parking, landscaping and associated works.	Detailed consent	Windfall	NB	PBSA	**165**	0	0	165	0	0	0	0	0	0	0	0	0	0	0	0	0	0
83	PL/2023/0001042/FULM	21/10/2024	Mills Forgings Ltd Charterhouse Road	Demolition of existing buildings and erection of part 4 and part 6-storey building for purpose-built student accommodation comprising 130 rooms, with associated communal and external amenity space, landscaping and cycle parking.	Detailed consent	Windfall	NB	PBSA	**130**	0	0	0	130	0	0	0	0	0	0	0	0	0	0	0	0	0

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84	FUL/2021/1734	10/11/2023	The Empire, 150 Far Gosford Street	Demolition of existing buildings and redevelopment of the site for student accommodation with a commercial unit on the ground floor	Detailed consent	Windfall	NB	PBSA	**91**	0	0	0	0	0	91	0	0	0	0	0	0	0	0	0	0
85	PL/2023/000032 9/RESM	17/05/2023	8 Park Road	Submission of reserved matters details of appearance and landscaping, pursuant to planning permission OUT/2022/0356 granted 09/12/2022 for Hybrid application. Outline planning application for new, 21 unit apartment block (access, layout and scale for consideration) landscaping reserved. Full planning application for the demolition of single storey rear extensions of former Cheshunt school and conversion of the original building into 10 student apartments.	Detailed consent	Windfall	COU	Resi/PBSA mix	**31**	0	10	10	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0
86	PL/2024/000128 2/FULM	20/02/2025	The New Haven Dillotford Avenue	Demolition of existing public house. Erection of new apartment block of 31 x 1 bed apartments with associated carparking and landscaping	Detailed consent	Windfall	NB	Residential	**31**	0	31	0	0		0	0	0	0	0	0	0	0	0	0	0	0
87	RMM/2022/0501	16/11/2022	Nisaextra, 10, Westmede Centre Winsford Avenue	Application for approval of reserved matters (appearance and landscaping) following outline approval for planning application reference OUT/2020/1057 granted 07/06/2021	Detailed consent	Windfall	NB	Residential	**24**	0	0	24	0	0	0	0	0	0	0	0	0	0	0	0	0	0
88	PL/2024/000124 9/FUL	11/09/2024	Police Station Chace Avenue	Change of use from West Midlands Police Complex to a supported temporary homeless accommodation (Sui Generis) with associated secured fencing, installation of bicycle lockers, and waste bin storage area.	Detailed consent	Windfall	COU	HMO	**18**	0	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
89	PL/2024/000155 8/FUL	13/12/2024	Block 50 To 64 Corporation Street	Conversion and extension of the existing building into 15 residential apartments with 2 commercial spaces at ground floor. The following alterations to the existing building are proposed: enhance the building's active frontage at street level, extend the roof by one storey, complete re-clad of the street and side frontages to provide a thermally insulated external wall, new windows and cladding.	Detailed consent	Windfall	COU	Residential	**15**	0	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
90	PL/2023/000080 5/FULM	12/09/2023	St Clair Gardens Livingstone Road	Erection of three storey building to accommodate 26 supported bed-sits with associated landscaping and car parking	Detailed consent	Windfall	NB	Care	**14**	0	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
91	FUL/2020/0139	01/07/2022	54 Shilton Lane	Demolition of existing cattery and outbuildings. Erection of 13 assisted living accommodation units with associated communal facilities, parking and landscaping	Detailed consent	Windfall	NB	Residential	**13**	0	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
92	PL/2023/000065 7/FUL	08/11/2023	Methodist Church Macdonald Road	Demolition of former Macdonald Road Methodist Church and erection of the 10 no. apartments (reduced from 12) with parking, amenity space, cycle storage and associated works (Resubmission of application FUL/2021/3560).	Detailed consent	Windfall	NB	Residential	**10**	0	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
93	FUL/2022/2402	05/01/2024	Land Adjacent, 203-269 Foleshill Road	Erection of four-storey student accommodation building providing 10 studio apartments and associated bin and cycle stores and landscaping	Detailed consent	Windfall	NB	PBSA	**10**	0	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
94	PL/2023/000250 4/FUL	23/01/2024	Intercare Community Support, 11-13 Queen Victoria Road	Conversion of existing offices/storage to 9 flats	Detailed consent	Windfall	COU	Residential	**9**	0	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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95	FUL/2022/0220	30/06/2022	The Grapes, 85 Radford Road	Change of use from public house (Use Class Sui Generis) to public house and restaurant (Use Class Sui Generis) on ground floor and a 17no bedroomed House in Multiple Occupation (HMO) (Use Class Sui Generis) to the first and second floors, arranged over three cluster flats; external alterations comprising: to the front elevation facing onto Bridgeman Road: roof alteration, including hip to gable, and increase in roof height; elevation facing Fynford Road: infilling a gap to create one continuous roof plane; a third storey projecting gable and the insertion of an additional two dormers, with the existing dormers being pitched. To the rear: increase in roof height and hip to gable roof alterations to create a continuous roof plane and insertion of a box dormer and associated works; parking, bin storage and cycle storage. | Historic Reference: P/2021/3647	Detailed consent	Windfall	COU	HMO	**9**	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
96	PL/2023/0002572/FUL	19/07/2024	Pond Farm House Upper Eastern Green Lane	Demolition of existing garage and outbuilding and erection of 8 new build dwellings including associated access, car parking and landscaping. Demolition and re-building of brick wall fronting 6 Pond Farm Mews [232 Upper Eastern Green Lane].	Detailed consent	Windfall	NB	Residential	**8**	0	5	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
97	FUL/2022/0543	01/06/2022	256 Humber Road	Demolition of existing buildings and erection of a new building containing 7 flats	Detailed consent	Windfall	DEM/NB	Residential	**7**	0	0	0	0	7	0	0	0	0	0	0	0	0	0	0	0	0
98	FUL/2022/2287	07/09/2023	land to rear of 46 Henley Road &, Garage Block Miles Meadow	Demolition of existing garages and erection of 7no 2 and 3 bedroomed houses with associated access, parking and landscaping.	Detailed consent	Windfall	NB	Residential	**7**	0	5	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
99	PL/2023/0002357/FUL	30/01/2024	St Thomas House Albany Road	Ground floor extension and internal refurbishment to form 7 self-contained flats for use as social housing.	Detailed consent	Windfall	NB	Residential	**7**	0	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
100	PL/2023/0002511/FUL	08/02/2024	Wellbeing Pharmacy, 8 Prior Deram Walk	Demolition of existing building and erection of 7 No. open market residential apartments, pharmacy hub and associated car parking and landscaping (Re-submission of FUL/2022/0811)	Detailed consent	Windfall	NB	Residential	**7**	0	0	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0
101	PL/2023/0002143/FUL	21/03/2024	The Bear And Staff Princethorpe Way	Demolition of existing public house and erection of a convenience store (Use Class E) and 7 apartments (Use Class C3).	Detailed consent	Windfall	NB	Residential	**7**	0	0	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0
102	PL/2024/0000299/FUL	28/11/2024	Ainsley Grange Pickford Green Lane	Application for the erection of 4 semi-detached dwellings with associated access, parking and landscaping	Detailed consent	Windfall	NB	Residential	**7**	0	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
103	FUL/2022/0497	14/12/2022	38 Park Road	Change of use from single dwelling to seven flats	Detailed consent	Windfall	CON	Residential	**6**	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
104	FUL/2022/0625	24/05/2022	12 Regent Street	Extension, alterations and conversion of the existing Ashdowns guest house into assisted living accommodation with 11 bedrooms consisting of ground floor rear extension, new front porch and rooflights to the ground and second floors	Detailed consent	Windfall	COU	Care	**6**	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
105	PL/2023/0000105/FUL	14/03/2023	Warwick House, 7 Warwick Street	Demolition of existing temporary building and erection of 6 apartments (Use Class C3b) with associated office, parking and landscaping.	Detailed consent	Windfall	NB	Residential	**6**	0	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0
106	FUL/2022/0242	10/02/2023	34 Chester Street	Application for proposed single storey extension, new roof, two rear dormers and a two storey rear extension, together with conversion to 8 studios and 1 flat	Detailed consent	Windfall	CON	Residential	**5**	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
107	PL/2022/0000218/FUL	17/02/2023	Avalon Guest House, 28 Friars Road	Change of use of 9 bedrooms Guest House (Use Class C1) into 9 bedroom, 9 person House in Multiple Occupation (Sui Generis)	Detailed consent	Windfall	COU	HMO	**5**	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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108	PL/2023/0000177/FUL	14/05/2023	6 Warwick Row	Listed Building application for works involved to change of use of first and second floors from office to 3no. x 2 bedroom flats and 2no. 1 bedroom flats	Detailed consent	Windfall	COU	Residential	5	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0
109	PL/2023/0001798/FUL	16/11/2023	Land And Buildings On The East Side Of Wilsons Lane	Demolition of all existing structures and the erection of six new dwellings with parking, amenity space, landscaping and associated works. (Resubmission PL/2022/0000251/FUL).	Detailed consent	Windfall	NB	Residential	5	0	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0
110	FUL/2022/2284	17/03/2023	Ainsley Grange Pickford Green Lane	Proposed new development for 5 new houses. This includes a partial demolition and extension to of Ainsley Grange to form an extended access road together with improvements to the site entrance off Pickford Green Lane	Detailed consent	Windfall	NB	Residential	5	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
111	PL/2023/0000167/FUL	13/09/2024	Garage Block Meadfoot Road	Demolition of existing garages and erection of 2no 2-bedroom houses and 2no 3-bedroom houses with associated access, landscaping and parking. Relocation and retention of 8no general parking spaces and 1no privately owned parking space.	Detailed consent	Windfall	NB	Residential	5	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
112	FUL/2022/1548	28/07/2022	13c-13d Kensington Road and 1 Westwood Road	Proposed change of use at ground floor from retail (Class E) to C3 Residential Dwelling and the conversion of 2no. dwellings to provide a total of 4no. flats with small extension to rear and associated alterations	Detailed consent	Windfall	COU	Residential	4	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
113	PL/2023/0001033/FUL	02/11/2023	16-18 Henley Road	Proposed change of use Class E(e) to Use Class C2 residential care home with alterations to existing building and proposed landscaping.	Detailed consent	Windfall	COU	Care	4	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
114	RM/2021/3791	04/04/2022	260A Hawkes Mill Lane	Application for approval of reserved matters (appearance and landscaping) pursuant to permission OUT/2020/2762 (APP/U4610/W/21/3269710), granted on appeal, 31st July 2021 for the 'Demolition of existing buildings and erection of four dwellings (Outline application with access, scale and layout to be considered)'.	Detailed consent	Windfall	NB	Residential	4	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
115	PL/2024/0001387/FUL	01/10/2024	45 St Patricks Road	Change of use from single dwelling to five 1 bedroom flats	Detailed consent	Windfall	CON	Residential	4	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0
116	PL/2023/0001274/FUL	15/01/2024	79 Sandy Lane	Extension and renovation of the existing property into 4 self contained 1 bedroom flats (FUL/2022/3075). The internal layout of the flats has been amended slightly to make them all 1 bed flats, rather than studio flats.	Detailed consent	Windfall	NB	Residential	4	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
117	PL/2023/0000786/FUL	21/03/2024	Garage Block Bramston Crescent	Demolition of existing garages and erection of four two storey dwellings with associated landscaping and parking provision and one replacement garage.	Detailed consent	Windfall	NB	Residential	4	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
118	PL/2024/0000426/FUL	25/06/2024	108a Station Street East	Erection of new apartment block 4 one bed self contained accommodation with associated alterations	Detailed consent	Windfall	NB	Residential	4	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
119	PL/2024/0002037/FUL	23/12/2024	Land Adjoining, Garages Congleton Close	Demolition of garages and e rection of 1 HMO dwelling (8 Bedrooms)	Detailed consent	Windfall	NB	HMO	4	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
120	PL/2023/0002538/FUL	01/03/2024	The Stables, Styvechale Manor Courtyard Leamington Road, Coventry, CV3 6GG	Demolition of existing outbuildings and erection of 4no. new build dwellings	Detailed consent	Windfall	NB	Residential	4	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
121	PL/2024/0002331/FUL	11/02/2025	49 Allesley Old Road	Conversion of existing HMO and lettings office to 8 one-bedroom apartments, elevational alterations, first floor rear extension, new dormer and removal of garage	Detailed consent	Windfall	COU	Resi/HMO	4	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
122	PL/2023/0002444/FUL	22/10/2024	52 Moor Street	New residential development of four flats on a derelict parking site	Detailed consent	Windfall	NB	Residential	4	0	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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123	PL/2024/0000964/FUL	18/07/2024	48 Irving Road	Erection of a two-storey side and rear extension, and change of use from a single dwellinghouse (Use Class C3) to a 7no bedroomed, 7no. person House in Multiple Occupation (Sui Generis).	Detailed consent	Windfall	COU	HMO	**4**	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
124	PL/2022/0000066/FUL	13/02/2023	32 Centenary Road	Single storey rear extension and loft conversion to create 7 bed HMO	Detailed consent	Windfall	COU	HMO/Resi	**3**	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
125	FUL/2022/0117	06/04/2022	197 Charter Avenue	Change of use from dwelling (C3 Use Class) to a 7 bed HMO (Use Class Suis Generis) with erection of extensions to front, side and rear elevations and alterations to the roof to include hip to gable extension and dormer to the rear elevation (Resubmission of FUL/2020/2966)	Detailed consent	Windfall	COU	HMO/Resi	**3**	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
126	PL/2023/0000485/FUL	04/05/2023	78 Charter Avenue	Single storey rear and double storey side extension, loft conversion to create 8 bed HMO	Detailed consent	Windfall	COU	HMO/Resi	**3**	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
127	PL/2023/0000517/FUL	22/06/2023	124 Queen Margarets Road	Proposed change of use to 7 bedroom HMO (sui generis); double storey wrap-around extension	Detailed consent	Windfall	COU	HMO/Resi	**3**	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
128	PL/2023/0001072/FUL	08/08/2023	127 Charter Avenue	Two-storey side and rear wrap-around extension. Single storey front and rear extensions. Proposed hip to gable loft conversion and erection of rear dormer and change of use to a 7-bed HMO (sui generis).	Detailed consent	Windfall	COU	HMO/Resi	**3**	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
129	PL/2023/0000487/FUL	24/08/2023	85 John Rous Avenue	Change of use from 5 bedroom dwelling to 7 bedroom HMO, single storey rear extension and rear dormer	Detailed consent	Windfall	COU	HMO/Resi	**3**	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
130	PL/2023/0001381/FUL	13/12/2023	200 Charter Avenue	Two-storey side and rear wrap-around extension. Single storey front and rear extensions. Proposed hip to gable loft conversion and erection of rear dormer and change of use to a 7-bed HMO (sui generis).	Detailed consent	Windfall	COU	HMO/Resi	**3**	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
131	PL/2024/0000393/FUL	24/04/2024	Flat, 181 Spon Street	Change of use from a single flat to be used a 4 self-contained flats and 1 serviced 'Airbnb' type unit.	Detailed consent	Windfall	CON	Residential	**3**	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
132	PL/2024/0001381/FUL	11/09/2024	9, 10 And 11 Priory Row	Change of use of 9 & 10 Priory Row including the retention of office use (Use Class E) on ground and part of the first floor with 3no. self-contained dwelling houses (Use Class C3) across the first and second floor with associated internal and external alterations including the demolition of external oil tank enclosure and erection of bin store and minor alterations to no.11 Priory Row to alter the existing residential use and segregate it from the office use within the building.	Detailed consent	Windfall	COU	Residential	**3**	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
133	PL/2024/0000825/FUL	16/09/2024	2 Grasscroft Drive	Two storey side and rear extensions, alterations and change of use from residential to 7 bedroom HIMO	Detailed consent	Windfall	COU	HMO/Resi	**3**	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
134	FUL/2022/0363	13/04/2022	Land between 15 and 17 Charter Avenue	Erection of 3 flats	Detailed consent	Windfall	NB	Residential	**3**	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
135	FUL/2022/3133	30/11/2023	Codys Court, Silverdale Close	Construction of three dwellinghouses with associated landscaping and parking	Detailed consent	Windfall	NB	Residential	**3**	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
136	PL/2023/0001307/FUL	01/02/2024	Congleton Close	Erection of 2 No flats and 1 maisonette with associated alterations	Detailed consent	Windfall	NB	Residential	**3**	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
137	PL/2024/0000020/FUL	25/10/2024	Westmede Centre Winsford Avenue	Application for new residential flats, shop units, entrance canopy, lean to roof extension and coffee kiosk	Detailed consent	Windfall	NB	Residential	**3**	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
138	PL/2024/0002019/FUL	17/12/2024	126 Paynes Lane	Conversion of existing dwelling into 3no. one bedroom flats and 1no. two bedroom flat.	Detailed consent	Windfall	CON	Residential	**3**	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
139	PL/2024/0002387/FUL	22/01/2025	253-255 Cross Road	Change of use of 253 and 255 Cross Road from 6 flats at each property into a 5-bedroom 5-person HMO at each property and retention of external wall insulation	Detailed consent	Windfall	COU	HMO/Resi	**3**	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
140	PL/2024/0002453/FUL	30/01/2025	1 Swanswell Street	Change of use of first floor offices (Use Class E) to 5 bedroom, 5 person House in Multiple Occupation (Use Class C4).	Detailed consent	Windfall	COU	HMO	**3**	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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141	PL/2025/000018 7/FUL	27/03/2025	9 Charter Avenue	Erection of two-storey side extension to create 3 x single-person flats.	Detailed consent	Windfall	NB	Residential	**3**	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
142	FUL/2022/1691	15/12/2022	126 De Montfort Way	Proposed change of use from residential to Class C2 (residential care home) for up to, and including, 6no adults.	Detailed consent	Windfall	COU	Care/Resi	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
143	FUL/2021/3116	11/01/2022	169 Fletchamstead Highway	Proposed loft conversion including dormer to the rear, erection of shed to the rear with associated alterations to facilitate a 6 bed HMO	Detailed consent	Windfall	COU	HMO/Resi	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
144	FUL/2021/3776	23/03/2022	77 Queen Margarets Road	Erection of two storey side extension and single storey rear extension to facilitate a 6 bed HMO (Use Class C4)	Detailed consent	Windfall	CON	HMO/Resi	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
145	FUL/2022/3288	27/01/2023	257 Humber Avenue	First floor side extension, addition of feature bay to front and single storey rear extension and use of property as a House in Multiple Occupation for 6 people (Use Class C4).	Detailed consent	Windfall	COU	HMO/Resi	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
146	FUL/2021/2847	14/04/2022	300A Foleshill Road	Change of use from a six bedroomed House in Multiple Occupation (HMO) (Use Class C4) to a ten bedroomed House in Multiple Occupation (HMO) (Use Class sui generis).	Detailed consent	Windfall	COU	HMO	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
147	PL/2023/000035 2/FUL	31/03/2023	30 Binley Road	Change of use from offices (Use Class E) to create 2x 2-Bed Flats (Use Class C3) and associated works.	Detailed consent	Windfall	COU	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
148	FUL/2021/3672	16/02/2022	Land at Troyes Close	Erection of 2no 3 bedroomed semi-detached dwellings with associated parking and access.	Detailed consent	Windfall	NB	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
149	FUL/2021/3674	16/02/2022	Garage Block Heather Road	Demolition of existing garages and erection of two, one bedroomed bungalows and associated parking and landscaping.	Detailed consent	Windfall	NB	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
150	PL/2023/000030 4/HHA	04/04/2023	64 Charter Avenue	Single storey rear extension and loft conversion with rear dormer: for use as a 6 bed HMO. (Use Class C4)	Detailed consent	Windfall	COU	HMO/Resi	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
151	PL/2023/000030 0/HHA	04/04/2023	40 Charter Avenue	Single storey rear extension and loft conversion with rear dormer: for use as a 6 bed HMO. Use Class C4	Detailed consent	Windfall	COU	HMO/Resi	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
152	FUL/2022/0813	19/05/2022	Garage Block at Fern Close	Demolition of existing garages and erection of 2no bungalows and associated landscaping and parking	Detailed consent	Windfall	NB	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
153	PL/2023/000035 7/HHA	17/04/2023	230 Sir Henry Parkes	Erection of single storey extension and dormer to rear; for use as a small HMO (Use Class C4)	Detailed consent	Windfall	COU	HMO/Resi	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
154	PL/2023/000041 5/HHA	18/04/2023	296 Mitchell Avenue	Proposed loft conversion and single storey rear extension to facilitate use as a 5 bed HMO (Use Class C4)	Detailed consent	Windfall	COU	HMO/Resi	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
155	PL/2023/000065 2/FUL	22/05/2023	41 Tomson Avenue	Erection of two storey side and rear extension and a single storey rear extension for the conversion of existing dwelling to three flats (Resubmission of FUL/2022/2001)	Detailed consent	Windfall	CON	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
156	FUL/2022/2141	10/10/2022	Garage blocks Sampson Close Rear of Nos. 6 to 10 Benedict Square	Erection of 2 no. modular semi-detached bungalows with associated parking and landscaping, together with parking and landscaping on remainder following demolition of all but one of the garages and extension of adopted footpath.	Detailed consent	Windfall	NB	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
157	FUL/2022/3224	22/06/2023	Garages To The Rear Of 10 To 16 Dillam Close	Demolition of garages and construction of two bungalows and six new garages along with associated access; car parking; and landscaping. (Resubmission of ref. R/2006/2106)	Detailed consent	Windfall	COU	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
158	PL/2023/000106 9/FUL	14/09/2023	230 Sir Henry Parkes Road	Single storey extension and dormer to rear and change of use to a 7-bed HMO (sui generis)	Detailed consent	Windfall	COU	HMO	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
159	PL/2023/000105 4/FUL	14/09/2023	10 Lichen Green	Two storey side and rear and single storey rear extension and change of use to a 7-bed HMO (sui generis)	Detailed consent	Windfall	COU	HMO	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
160	PL/2023/000022 6/FUL	28/03/2023	Flat, 358-360 Aldermans Green Road	Erection of two new dwellings	Detailed consent	Windfall	NB	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
161	PL/2023/000184 8/FUL	30/11/2023	50 Centenary Road	Change of use to 7 bed HMO	Detailed consent	Windfall	COU	HMO	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
162	FUL/2022/2621	05/04/2023	144 Whitworth Avenue	Erection of 2 no semi detached bungalows with associated parking and landscaping	Detailed consent	Windfall	NB	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

No.	Planning app	Decision date	Location	Proposal	Status	Supply type	Dev type	Tenure type	Remaining capacity	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41
163	PL/2023/000231 5/FUL	04/01/2024	67 Holyhead Road	Application for conversion of 7 rooms and 7 person HMO into 7 rooms and 10 person HMO (Sui Generis).	Detailed consent	Windfall	CON	HMO	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
164	PL/2023/000120 1/FUL	17/01/2024	8 Orlescote Road	Application for proposed change of use from 4 bed HMO to 7 Bedroom HMO with double storey rear extension.	Detailed consent	Windfall	COU	HMO	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
165	PL/2023/000019 6/FUL	30/05/2023	Garage Block Foresters Road	Erection of 2no 3 bedroom houses with associated access, landscaping and parking. Private drive to existing properties retained	Detailed consent	Windfall	NB	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
166	PL/2023/000070 6/FUL	05/09/2023	Former Garage Site Adjacent To 2-26 Everdon Road	Erection of 2no 3 bedroomed dwellings with associated access and parking, relocation of 1 no. garage and stopping up of highway	Detailed consent	Windfall	NB	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
167	PL/2023/000255 1/LDCP	29/01/2024	35 Blandford Drive	Application for a Lawful Development Certificate for a proposed 5-person House in Multiple Occupation (Use Class C4).	Detailed consent	Windfall	COU	HMO/Resi	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
168	PL/2024/000007 0/LDCP	06/03/2024	143 Northfield Road	Application for a Lawful Development Certificate for the proposed erection of a rear dormer window to facilitate a loft conversion and proposed use as a 6-person House in Multiple Occupation (Use Class C4).	Detailed consent	Windfall	COU	HMO/Resi	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
169	PL/2023/000260 4/FUL	08/03/2024	15 Willowbank Mews	Change of use from 12 bed House in Multiple Occupation to 7no. 1 bedroom student studios.	Detailed consent	Windfall	COU	PBSA	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
170	FUL/2022/2851	10/10/2023	Garage Block On East Side Next To 19 And 41 Thimbler Road	Erection of 2 no. detached bungalows with associated landscaping and parking, and erection of detached replacement garage following demolition of existing garages.	Detailed consent	Windfall	NB	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
171	PL/2023/000079 4/FUL	16/11/2023	Garage Block Rear Of 96-100 Luscombe Road	Erection of 2 no. 3 bedroomed dwellings with associated parking, access and landscaping, provision of amenity green space and stopping up of the highway, following demolition of existing garages	Detailed consent	Windfall	NB	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
172	PL/2024/000038 5/FUL	30/04/2024	14 Bromleigh Drive	Applicaion for 2 no. 1 bedroom flats with associated off street parking	Detailed consent	Windfall	NB	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
173	PL/2023/000019 7/FUL	24/06/2024	Garage Block Rear Of 152 To 174 Dillotford Avenue	Demolition of existing garages and erection of two new dwellings with associated access, parking and landscaping.	Detailed consent	Windfall	NB	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
174	PL/2024/000117 9/FUL	18/10/2024	40 Ansty Road	Erection of two-storey front and rear extension with first-floor side extension and single-storey side and rear extensions to accommodate an increase from 6no. bedroom Care Home (Use Class C2) to 9no. bedrooms with ancillary facilities, with the erection of outbuilding and ancillary landscaping and parking provision including improvements to existing vehicular access.	Detailed consent	Windfall	NB	Care	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
175	PL/2023/000217 3/FUL	19/02/2024	193 Allesley Old Road	Application for proposed 5 bedroom 5 person HMO	Detailed consent	Windfall	COU	HMO/Resi	**2**	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
176	PL/2023/000228 3/FUL	26/02/2024	13 Clarendon Street, Coventry, CV5 6EW	Change of use from existing dwelling (Use Class C3) to 5-Bed House in Multiple Occupation (Use Class C4)	Detailed consent	Windfall	COU	HMO/Resi	**2**	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
177	PL/2024/000237 6/FUL	15/01/2025	Lant To The East Of, 4 Welford Place	Erection of two new dwellings	Detailed consent	Windfall	NB	Residential	**2**	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
178	PL/2024/000255 3/FUL	07/02/2025	6 Middleborough Road	Continued use of ground floor as HMO and first floor side and rear extensions to provide 3 self-contained flats at first and second floor	Detailed consent	Windfall	COU	Resi/HMO	**2**	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
179	PL/2024/000069 7/FUL	#REF!	#REF!	#REF!	Detailed consent	Windfall	NB	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
180	PL/2023/000123 0/FUL	09/08/2023	76 Whitefriars Street	Conversion of existing offices (use class E) into student accommodation (use class Sui generis) including infill undercroft.	Detailed consent	Windfall	COU	PBSA	**1**	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0

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181	FUL/2022/1338	25/07/2022	121 Leicester Causeway	Sub-division of the existing building to create a new residential dwelling to the second floor and associated works including a rear dormer window	Detailed consent	Windfall	COU	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
182	FUL/2022/1901	31/08/2022	73 Northumberland Road	Change of use from a single dwellinghouse (Use Class C3) to two, one bedroomed flats and alterations to fenestration and doors.	Detailed consent	Windfall	CON	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
183	FUL/2022/3120	16/12/2022	11 Humber Road	Change of use of existing dwelling (Use Class C3) to two one-bedroomed flats	Detailed consent	Windfall	CON	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
184	FUL/2022/2374	16/11/2022	108 The Boxhill	Demolition of existing garages and erection of 1 No. one bedroom bungalow with associated parking and landscaping	Detailed consent	Windfall	NB	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
185	FUL/2021/2048	10/01/2022	Blantyre Farm, 120 Wall Hill Road	Erection of two-storey self-build dwelling	Detailed consent	Windfall	NB	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
186	FUL/2021/3433	20/01/2022	George Eliot Medical Centre 178 Foleshill Road	First floor side extension to create one bedroomed flat	Detailed consent	Windfall	NB	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
187	FUL/2022/0388	27/05/2022	37 Wheelwright Lane	Application for conversion of a single dwelling to two flats with a two-storey rear extension and new parking provision.	Detailed consent	Windfall	CON	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
188	FUL/2022/0124	09/03/2022	21 Jackers Road	Erection of a detached dwellinghouse	Detailed consent	Windfall	NB	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
189	PL/2023/000005 7/FUL	21/02/2023	174 Shakespeare Street	Change of use from [*5 bed*] dwellinghouse (Use Class C3) to Residential Care for children (Use Class C2).	Detailed consent	Windfall	COU	Care/Resi	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
190	FUL/2022/0817	31/05/2022	45 Grindle Road	Erection of a one bed dwelling with associated parking	Detailed consent	Windfall	NB	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
191	FUL/2022/1731	25/08/2022	31 Uxbridge Avenue	Erection of new dwelling to rear	Detailed consent	Windfall	NB	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
192	FUL/2022/3210	06/03/2023	1 Lyttleton Close	Change of use from a dwellinghouse (Use Class C3) to a residential institution for children / young adults (Use Class C2).	Detailed consent	Windfall	COU	Care/Resi	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
193	PL/2023/000009 2/FUL	23/03/2023	11 Spencer Avenue	Change of use of property to dwelling (C3 Use Class).	Detailed consent	Windfall	COU	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
194	FUL/2022/1892	07/09/2022	8 Bates Road	Erection of single dwelling	Detailed consent	Windfall	NB	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
195	FUL/2022/2560	16/12/2022	60 Nod Rise	Demolition of garage and single-storey side addition and construction of one-bedroom bungalow with associated parking and landscaping adjacent to no. 60 and construction of new side porch to no. 60	Detailed consent	Windfall	NB	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
196	RM/2022/2982	10/02/2023	Oaken End Farm Oak Lane	Application for approval of reserved matters (access, appearance, landscaping and layout) pursuant to permission OUT/2018/3041 granted on 14/01/2020 for the erection of stable block, menage, workshop (live and work unit) (Outline application all matters except access and layout reserved)	Detailed consent	Windfall	NB	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
197	PL/2023/000007 7/FUL	26/07/2023	Garage Block Brisbane Close	Demolition of existing garages and erection of 1no 3 bedroom modular house with associated access, landscaping and parking and stopping up of highway	Detailed consent	Windfall	COU	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
198	PL/2022/000010 9/FUL	09/03/2023	Harvest Hill Car Sales, At Oak Lane	Change of use of existing commercial buildings to one dwellinghouse, single-storey extensions and associated alterations (resubmission of permission ref. FUL/2021/2805 with the addition of a car port with bat loft to the north-east of the building)	Detailed consent	Windfall	COU	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
199	PL/2023/000107 1/FUL	18/09/2023	40 Charter Avenue	Single storey rear extension and loft conversion with rear dormer and change of use to a 7-bed HMO (sui generis).	Detailed consent	Windfall	COU	HMO	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
200	FUL/2022/2619	05/01/2023	Former Garage Site, West Of 8-10 The Vale	Erection of 1no 2 bedroom bungalow with associated landscaping and parking. [former garage site]	Detailed consent	Windfall	NB	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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201	PL/2023/000140 5/FUL	17/01/2024	154 Charter Avenue	Change of Use to 4 x single person flats with loft conversion and two storey side extension.	Detailed consent	Windfall	COU	Resi/HMO	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
202	FUL/2022/2629	18/01/2023	22 Woodshires Road	Demolition of garage and erection of [*4 bed*] detached dwelling	Detailed consent	Windfall	NB	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
203	FUL/2022/2603	21/03/2023	Garage Block Ashburton Road	Erection of 1 no. modular detached bungalow with associated parking and landscaping following demolition of garages	Detailed consent	Windfall	NB	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
204	FUL/2022/2372	23/05/2023	Garages (rear Of The Lindfield And Treforest Road) Whitworth Avenue	Erection of 1No. 3 bedroomed house with associated parking and landscaping following demolition of 1 No. garage	Detailed consent	Windfall	NB	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
205	PL/2023/000038 4/FUL	17/04/2023	944 Broad Lane	Demolition of bungalow and erection of 2no. four bedroom dwellings with associated alterations	Detailed consent	Windfall	NB	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
206	PL/2023/000020 2/FUL	19/04/2023	Land At Wroxhall Drive	Erection of 1no 1 bedroom modular bungalow with associated access, parking and landscaping	Detailed consent	Windfall	NB	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
207	PL/2023/000247 1/FUL	11/04/2024	23 Charter Avenue	Erection of part first floor and ground floor rear extensions to existing HMO to create a 5-Bed House in Multiple Occupation (Use Class C4) and associated works	Detailed consent	Windfall	COU	HMO	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
208	PL/2023/000252 4/FUL	23/05/2024	88 Station Street West	Change of use from single dwelling house to 2no. 1 bed flats, dormer to rear, rooflights to front elevation and single storey, infill extension to rear outrigger.	Detailed consent	Windfall	CON	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
209	PL/2023/000252 5/FUL	24/05/2024	60 Princess Street	Change of use of single dwellinghouse to, two (one bedroomed) flats and the erection of a rear dormer with associated alterations	Detailed consent	Windfall	CON	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
210	PL/2023/000028 9/FUL	25/05/2023	Merton House Cryfield Grange Road	Erection of one new dwellings with associated access (previously approved under FUL/2016/1897 and FUL/2019/1119).	Detailed consent	Windfall	NB	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
211	PL/2023/000090 1/FUL	29/06/2023	Street Record The Lindfield	Erection of a two bedroom bungalow with associated parking, landscaping and widening of access road following demolition of 10 garages (Re-submission of FUL/2022/2373)	Detailed consent	Windfall	NB	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
212	FUL/2022/0874	27/05/2022	12 South Avenue	Erection of 2 storey, 4 bedroom detached dwelling to the side of 12 South Avenue and associated access and landscaping works	Detailed consent	Windfall	NB	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
213	PL/2023/000156 6/FUL	07/12/2023	34 Old Mill Avenue	Extension and subdivision of property into 2 dwellings (Use Class C3) and associated works, including single storey rear extension.	Detailed consent	Windfall	NB	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
214	PL/2023/000248 2/FUL	17/01/2024	104 Kenilworth Road	Demolition of existing swimming pool building and erection of single storey dwelling (Re-submission of FUL/2021/0745)	Detailed consent	Windfall	NB	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
215	PL/2023/000252 2/FUL	24/05/2024	12 St Elizabeths Road	Change of use of single dwellinghouse to, two (one bedroomed) flats and the erection of a rear dormer with associated alterations	Detailed consent	Windfall	CON	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
216	PL/2023/000254 0/FUL	29/01/2024	2 Holmcroft	Demolition of outbuilding to side of property for erection of 1no. 2-bedroom dwelling house adjacent to existing dwelling house with associated works.	Detailed consent	Windfall	NB	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
217	PL/2023/000213 5/FUL	01/02/2024	163 Hall Green Road	Application for demolition of existing outbuilding and erection of a detached dwelling and works to 163 Hall Green Road	Detailed consent	Windfall	NB	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
218	PL/2023/000262 9/FUL	09/02/2024	42 Gresley Road	Rear extension to No.42 and erection of new 3 bed detached dwelling with associated parking.	Detailed consent	Windfall	NB	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
219	PL/2023/000262 2/FUL	23/02/2024	144 Meadfoot Road	Erection of one bedroom detached bungalow	Detailed consent	Windfall	NB	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
220	PL/2024/000019 1/FUL	29/05/2024	16 Middlecotes	Change of use from C3 to C4 HMO. 4 bed, 4 person HMO	Detailed consent	Windfall	CON	HMO/Resi	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
221	PL/2023/000252 1/FUL	31/05/2024	14 Eld Road	Change of use from single dwellinghouse to, two, one bedroomed flats, erection of a rear dormer and associated external changes.	Detailed consent	Windfall	CON	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0

No.	Planning app	Decision date	Location	Proposal	Status	Supply type	Dev type	Tenure type	Remaining capacity	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41
222	PL/2024/0000762/LDCE	06/06/2024	PL/2024/0000762/LDCE	Application for Lawful Development Certificate for existing use as a 4-bed 4-person HMO (Use Class C4)	Detailed consent	Windfall	COU	HMO/Resi	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
223	PL/2024/0000434/FUL	19/06/2024	21 Larch Tree Avenue	Two storey side extension and single storey rear extension, including change of use from single dwelling to two flats	Detailed consent	Windfall	CON	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
224	PL/2024/0000771/FUL	25/06/2024	21 Thimbler Road	Conversion of dwelling into 2 flats	Detailed consent	Windfall	CON	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
225	PL/2024/0000177/FUL	04/07/2024	9 Newfield Road	Conversion of 3 bedroom house into 2 separate units (flats)	Detailed consent	Windfall	CON	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
226	PL/2024/0000427/FUL	10/07/2024	113 Holmsdale Road	Application for Change of Use of the existing 3 bedroom house (Use Class C3) to two one bedroom flats (use Class C3). and erection of rear extension at first floor	Detailed consent	Windfall	CON	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
227	PL/2023/0002153/FUL	24/01/2024	Harvest Hill Farm Oak Lane	Conversion of two storage buildings with extensions and alterations into one residential dwelling (use class C3)	Detailed consent	Windfall	COU	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
228	PL/2024/0001599/FUL	11/10/2024	37 Walsgrave Road	Alterations to an existing 5-bedroom House in Multiple Occupation and self-contained flat to form a 7-bedroom House in Multiple Occupation (Sui Generis).	Detailed consent	Windfall	COU	HMO	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
229	PL/2024/0000539/FUL	06/11/2024	Birch Tree Farm Wall Hill Road	Listed Building Consent for conversion of former barn to new dwelling with associated works	Detailed consent	Windfall	COU	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
230	PL/2024/0001407/FUL	14/11/2024	394 Grangemouth Road	Change of Use of existing single dwellinghouse to two, one bedroomed flats (Use Class C3); replacement flat roof to existing single storey rear extension and erection of a first floor rear extension.	Detailed consent	Windfall	CON	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
231	PL/2024/0000042/FUL	27/02/2024	40 Gresley Road, Coventry, CV2 1AZ	Erection of a detached 1-bedroom dwellinghouse.	Detailed consent	Windfall	NB	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
232	PL/2024/0000249/FUL	04/04/2024	48a Stratford Street	Erection of 1no. 2-bedroom dwelling house to rear of no.48 and 48a Stratford Street with private parking for new dwelling house and no.48a with associated landscaping	Detailed consent	Windfall	NB	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
233	PL/2023/0000199/FUL	30/07/2024	Garage Block Bowness Close	Erection of 1no 3 bedroom house with associated landscaping and parking, creation of 4no non-allocated parking spaces	Detailed consent	Windfall	NB	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
234	PL/2024/0001836/FUL	22/11/2024	24 Hugh Road	Conversion of existing 3-bed dwelling to 2no. flats with two-storey and single storey rear extensions	Detailed consent	Windfall	CON	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
235	PL/2024/0000462/FUL	08/08/2024	583 Foleshill Road	Erection of two storey side, first floor rear and single rear extension including alterations to first floor, one flat to two flats (Use Class C3)	Detailed consent	Windfall	NB	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
236	PL/2024/0001402/FUL	17/09/2024	5 Ulverscroft Road	Application for new detached dwelling in side garden	Detailed consent	Windfall	NB	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
237	PL/2024/0001126/FUL	10/10/2024	18-22 Gulson Road	Erection of a building to form a restaurant (Use Class E) at ground floor, office space (Use Class E) at first floor and a residential apartment (Use Class C3) within the roof space, with associated parking.	Detailed consent	Windfall	NB	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
238	PL/2024/0001188/FUL	17/10/2024	703 Stoney Stanton Road	Erection of a two-storey front extension to bring forward the retail unit at ground floor level, and alterations to accommodate a four-bedroom apartment and a one-bedroom apartment (Use Class C3).	Detailed consent	Windfall	NB	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
239	PL/2023/0000792/FUL	14/11/2024	38 Broad Park Road	Proposed development for 1no two-storey house with 2no parking spaces	Detailed consent	Windfall	NB	Residential	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
240	FUL/2022/0254	24/03/2022	198 Dorchester Way	Change of Use from Use Class C3 (Residential Dwelling) to Use Class C2 (Assisted/Supported Living Accommodation) for up to three persons plus carer	Detailed consent	Windfall	COU	Care/Resi	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
241	PL/2024/0002254/FUL	09/01/2025	2 Jackers Road	Conversion of existing dwelling into two self-contained residential apartments with associated amenity, cycle and refuse storage	Detailed consent	Windfall	CON	Residential	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
242	PL/2024/0001990/FUL	17/01/2025	10 Park Street	Conversion of house into 2 flats	Detailed consent	Windfall	CON	Residential	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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243	PL/2024/0002162/FUL	21/01/2025	9 Waterloo Street	Change of use from a dwelling house (Use Class C3) to a 4 bedroom, 7 person House in Multiple Occupation (Sui Generis).	Detailed consent	Windfall	COU	HMO/Resi	**1**	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
244	PL/2024/0001842/FUL	28/01/2025	190 Longford Road	Erection of new 2 bedroom dwelling	Detailed consent	Windfall	NB	Residential	**1**	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
245	PL/2024/0002555/FUL	06/02/2025	Goodlife House, 18 Brooklyn Road	Change of use to provide self-contained flat at ground floor	Detailed consent	Windfall	COU	Residential	**1**	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
246	PL/2024/0002165/RES	04/02/2025	1 Sefton Road	Application for approval of reserved matters (a ppearance, layout, scale) pursuant to permission PL/2024/0000994/OUT granted on 23/07/2024 for Erection of 1 no. 1 bedroom dwelling with details of associated parking and access from Merynton Avenue (all other matters reserved)	Detailed consent	Windfall	NB	Residential	**1**	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
247	PL/2024/0002577/FUL	11/03/2025	161 Cherry Tree Drive	Creation of 1 no. new dwelling (Use Class C3) and alterations to frontage of no. 161 Cherry Tree Drive and associated works	Detailed consent	Windfall	NB	Residential	**1**	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
248	PL/2025/0000051/FUL	19/03/2025	10 Sunway Grove	Erection of a single storey dwelling (Use Class C3) to garden area (Self build)	Detailed consent	Windfall	NB	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
249	FUL/2022/2620	30/11/2022	Former Garage Site East 34-36 The Vale	Erection of 1no 2 bedroom bungalow with associated landscaping and parking	Detailed consent	Windfall	NB	Residential	**1**	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
250	PL/2024/0000396/FUL	23/04/2024	9 Stoney Road	Single storey rear extension and conversion of ground floor to create additional flat	Detailed consent	Windfall	NB	Residential	**1**	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
251	FUL/2022/0684	24/11/2022	88 Craven Street	Change of use from 6 HMO`s to 3no. 1 Bed Apartments, external fenestration changes, external staircase and boundary wall.	Detailed consent	Windfall	COU	Resi/HMO	**0**	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
252	PL/2023/0000895/FUL	17/07/2023	58 Upper Hill Street	Change of use from 6 bed HMO (Use Class C4) to 3 flats (Use Class C3)	Detailed consent	Windfall	COU	Resi/HMO	**0**	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
253	FUL/2022/0887	16/06/2022	93 St Nicholas Street	Change the use from C3 Dwelling to C2 Residential Care Home	Detailed consent	Windfall	COU	Care/Resi	**0**	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
254	PL/2024/0002443/FUL	12/03/2025	21 Old Mill Avenue	Demolition of existing bungalow and erection of a new dwelling (Use Class C3)	Detailed consent	Windfall	NB	Residential	**0**					0	0	0	0	0	0	0	0	0	0	0	0
255	PL/2023/0002594/FUL	06/06/2024	39 Mount Street	Application for Change of Use from retail shop and residential (E) to dwelling house (C3). Alterations to doors and windows.	Detailed consent	Windfall	COU	Residential	**0**	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
256	FUL/2021/3377	08/03/2022	160 Aldermans Green Road	Change of use from single dwelling (Use Class C3) to a Children's Home for three residents (Use Class C2)	Detailed consent	Windfall	COU	Residential	**(1)**	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
257	FUL/2021/2960	11/03/2022	137 Avon Street	Proposed change of use of the first floor of the building from Use Class C3(a) to Sui Generis and the erection of a two storey side and rear extension.	Detailed consent	Windfall	COU	Residential	**(1)**	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
258	FUL/2022/1001	31/05/2022	70 John Rous Avenue	Change of use from dwellinghouse (C3) to Children's care home (C2)	Detailed consent	Windfall	COU	Residential	**(1)**	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
259	FUL/2022/1371	15/07/2022	32 Courtelle Road	Change of use from dwellinghouse (Use Class C3) to childrens home (Use Class C2) with conversion of existing garage for use as a additional bedroom and office.	Detailed consent	Windfall	COU	Residential	**(1)**	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
260	PL/2022/0000101/LDCP	13/02/2023	57 Stanley Road	Lawful development certificate to combine 2no. self-contained flats to reinstate the property to a single use dwelling house	Detailed consent	Windfall	COU	Residential	**(1)**	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
261	PL/2023/0001017/LDCP	22/09/2023	22 Woodshires Road	Application for a Lawful Development Certificate for proposed change of use to a children's residential home with up to two residents at a time (change of use from Class C3 to C2).	Detailed consent	Windfall	COU	Residential	**(1)**	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
262	PL/2023/0001118/	02/11/2023	19 Camelia Road	Change of use from residential (Class C3) to residential care home (Class C2) for use as children's home	Detailed consent	Windfall	COU	Residential	**(1)**	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
263	PL/2023/0002159/	01/12/2023	28 Cheshire Close	Change of use from dwellinghouse (Use Class C3) to residential children's' care home (Use Class C2) including a garage conversion to habitable room.	Detailed consent	Windfall	COU	Residential	**(1)**	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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264	PL/2023/000219 9/FUL	09/01/2024	Waterworks House Doe Bank Lane	Application for proposed change of use from Residential Use Class C3 to Children's Care Home Use Class C2	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
265	PL/2023/000240 4/FUL	10/01/2024	54 Johnson Road	Change of Use from dwellinghouse (C3 use) to children's home (C2 Use)	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
266	PL/2023/000242 3/FUL	01/03/2024	56 Macaulay Road, Coventry, CV2 5FB	Change of Use from residential (Use Class C3) to Private Health Clinic (Use Class E(e)).	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
267	PL/2024/000033 2/FUL	04/04/2024	2b Awson Street	Application for proposed conversion of Residential Property C3(a) to Children's Residential Care (C2)	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
268	PL/2024/000022 1/FUL	04/04/2024	25 Fieldfare Way	Change of use to a children's home (Use Class C2) for three residents	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
269	PL/2024/000026 6/FUL	05/04/2024	21 Arena Avenue	Change of use from a single dwellinghouse (Use Class C3) to a children's home for a maximum of two children (Use Class C2).	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
270	PL/2024/000031 5/FUL	08/04/2024	23 Berry Street	Change of use of a dwellinghouse (Use Class C3) to a dental surgery (Use Class E) and associated internal and external works.	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
271	PL/2023/000259 6/FUL	12/04/2024	88 Tomson Avenue	Application for Change of Use from dwelling house (Class C3) to a residential children's home (Class C2)	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
272	PL/2024/000041 7/FUL	26/04/2024	1 Burns Road	Change of use from a dwelling house (Use Class C3) to Dental Surgery offices, storage and staff rest rooms (Use Class E).	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
273	PL/2024/000051 0/FUL	10/05/2024	4 Manor Hall Mews	Change of use from a dwellinghouse (Use Class C3) to a children's home for two children (Use Class C2).	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
274	PL/2024/000006 0/FUL	29/05/2024	37 Daventry Road	Change of use from C3 dwelling house to C2 residential institution with a single storey rear extension.	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
275	PL/2024/000082 6/FUL	05/06/2024	24 Bishopton Close	Conversion of Residential Property C3(a) to Children's Residential Care (C2) - one child and two staff members, and garage conversion into habitable space.	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
276	PL/2024/000103 1/FUL	24/07/2024	38 The Martyrs Close	Change of use to a children's home for 2 children's	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
277	PL/2024/000095 1/FUL	13/08/2024	2 Arena Avenue	Application for proposed conversion of Residential Property (C3a) to Children's Residential Care (C2)	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
278	PL/2024/000103 2/FUL	05/09/2024	12 Queen Isabels Avenue	Change of use to a children's home for 2 children	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
279	PL/2024/000136 3/FUL	06/09/2024	385 Stoney Stanton Road	Change of use from dwellinghouse (C3) to Barber Shop (Ea) with associated alterations	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
280	PL/2024/000135 9/FUL	10/09/2024	383 Stoney Stanton Road	Change of use from dwellinghouse (C3) to Barber Shop (Ea) with associated alterations	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
281	PL/2024/000120 4/FUL	24/09/2024	50 Owens Road	Application to Change the Use of a (C3a) dwelling to a children's home (C2) for a maximum of three children	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
282	PL/2024/000195 0/FUL	11/12/2024	42 Deedmore Road	Change of use from dwellinghouse (Use Class C3) to children's home (Use Class C2)	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
283	PL/2024/000212 9/FUL	20/12/2024	26 Threadneedle Street	Change of use from C3 Dwellinghouse to C2 Children's home for maximum of one child	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
284	PL/2024/000212 7/FUL	20/12/2024	37 Threadneedle Street	Change of use from C3 Dwellinghouse to C2 Children's home for maximum of two children	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
285	PL/2024/000212 3/FUL	19/12/2024	34 Old Mill Avenue	Change the use of a dwelling to a children's home for up to six children, part garage conversion into habitable lounge	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
286	PL/2023/000239 7/FUL	08/02/2024	Lynden House, 3-5 Spencer Road	Change of use of Lindens Place from student accommodation to form 11 no. self-contained 3- and 4-bed family apartments and 18 no. single-person rooms with shared facilities	Detailed consent	Windfall	COU	Residential	(1)	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
287	PL/2024/000238 6/FUL	07/01/2025	25 Romsley Road	Change of use from C3 Dwellinghouse to C2 Children's home for maximum of two children	Detailed consent	Windfall	COU	Residential	(1)	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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288	PL/2024/000256 7/FUL	15/01/2025	9 Watersmeet Road	Change of use from a dwellinghouse (Use Class C3) to a Children's Home (Use Class C2).	Detailed consent	Windfall	COU	Residential	**(1)**	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
289	PL/2024/000234 9/FUL	13/01/2025	3 Cornwall Road	Change of use from dwellinghouse (Use Class C3(b)) to residential home for young people (Use Class C2).	Detailed consent	Windfall	COU	Residential	**(1)**	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
290	PL/2024/000234 1/FUL	17/01/2025	Caretakers Bungalow, President Kennedy School And Community College Rookery Lane	Change of use of an existing caretaker's bungalow (Use Class C3 Dwellinghouses) to become (Use Class F1 Learning and non-residential institutions). Building to be used for administration offices and storage space.`	Detailed consent	Windfall	COU	Residential	**(1)**	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
291	PL/2025/000016 7/FUL	24/03/2025	102 Glencoe Road	Change of use from residential dwelling (Use Class C3) to a children's care home (Use Class C2).	Detailed consent	Windfall	COU	Residential	**(1)**	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
292	PL/2023/000164 5/FUL	26/10/2023	92-94 Binley Road	Change of use to convert 92 - 94 Binley Road from residential space into an education facility for Pattison College	Detailed consent	Windfall	COU	Residential	**(2)**	(2)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
293	PL/2024/000008 5/FUL	08/03/2024	113-115 Kirby Corner Road	Demolition of two semi-detached dwellings at 113 and 115 Kirby Corner Road	Detailed consent	Windfall	DEM	Residential	**(2)**	0	(2)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
294	FUL/2022/2040	21/09/2022	340 Tile Hill Lane	Change of use from a [6 bed] HMO to a children's care home.	Detailed consent	Windfall	COU	HMO	**(3)**	0	(3)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
295	PL/2024/000041 5/FUL	17/05/2024	29 Middleborough Road	Change of use to a children's home (Use Class C2) for four children.	Detailed consent	Windfall	COU	HMO	**(4)**	0	(4)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
296	PL/2024/000245 2/FUL	31/01/2025	1-5 Hamlet Mews Shakespeare Street	Change of use of 5 bungalows from dwelling houses (Use Class C3) to be used for residential care (Use Class C2).	Detailed consent	Windfall	COU	Residential	**(5)**	(5)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
297	FUL/2021/2093	14/02/2022	Riley Square	Refurbishment of the Riley Square Shopping Precinct to include the installation of replacement shopfronts (including new roller shutters); removal of existing canopies; extension of Units 11, 13, 15, 59-67, 91 and 93 to create additional floorspace from the infilling of the undercrofts; a new site wide lighting scheme; associated landscaping and the demolition of Joseph Latham House (including ground floor retail units) and Unit 41.	Detailed consent	Windfall	NB	Residential	**(24)**	0	(24)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
298	OUT/2018/3225	03/06/2021	Land At Pickford Green Lane		Outline consent	Allocation	NB	Residential	**2,153**	0	0	0	53	50	150	150	200	200	200	200	200	200	200	200	150
299	OUT/2020/2009	17/10/2023	Land adjacent to Windmill Village Hotel Birmingham Road CV5 9AL	Demolition of 2 buildings on the Site and residential development of up to 566 dwellings (Use Class C3) including means of access into the Site (not internal roads) and associated works, with all other matters (relating to appearance, landscaping, scale, and layout) reserved	Outline consent	Allocation	NB	Residential	**566**	0	0	0	0	0	51	52	52	52	52	52	51	51	51	51	51
300	OUT/2021/3576	16/10/2023	Former Transco Site, Abbotts Lane	Full planning application for 212 dwellings (Class C3) served via access from Abbotts Lane and Upper Hill Street; strategic landscaping and earthworks; temporary car parking; surface water drainage and all other ancillary and enabling works. Outline planning application for new residential development upto 478 units (Class C3); ancillary Class E development up to 950sqm of floorspace; strategic landscaping and earth works; surface water drainage and all other ancillary infrastructure and enabling site works with means of access to be taken from the connections from Abbotts Lane and Upper Hill Street (part of the full application) for consideration; all other matters (layout, appearance, scale and landscaping) reserved for subsequent approval.	Outline consent	Allocation	NB	Residential	**478**	0	0	0	0	0	78	100	100	100	100	0	0	0	0	0	0

No.	Planning app	Decision date	Location	Proposal	Status	Supply type	Dev type	Tenure type	Remaining capacity	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41
301	OUT/2021/3041	03/03/2023	Land at Sutton Stop	Outline application (with all matters reserved except access) for the erection of up to 262 dwellings (Use Class C3); Demolition of No.294 and No.296 Grange Road to provide new vehicular access, new public open space, drainage, landscaping, car parking areas and other works.	Outline consent	Allocation	NB	Residential	**262**	0	0	0	12	50	50	50	50	50	0	0	0	0	0	0	0
302	PL/2023/000115 5/OUTM	23/12/2024	Hall Hill Cottage Fivefield Road	Outline planning permission with all matters reserved save for access, for the demolition of existing dwelling and associated agricultural units, and the erection of up to 40 residential dwellings (Use Class C3), with parking and associated works. (Re-submission of planning application OUT/2022/3246)	Outline consent	Allocation	NB	Residential	**40**	0	0	0	0	0	10	30	0	0	0	0	0	0	0	0	0	0
303	PL/2023/000221 8/RVC	15/12/2023	City Centre South Warwick Row	Hybrid planning application for: Full application: A. Full Application for removal of bridge link between Coventry Market roof top car park and roof top parking over existing retail units on Market Way and associated reinstatement works to roof top car park surface and balustrade, removal of existing Coventry Market basement ramp from Rover Road and associated infilling and reinstatement works, works to retaining wall to north-east of Coventry Market, removal of existing pedestrian ramp into Coventry Market off Rover Road, creation of new Coventry Market basement ramp from Queen Victoria Road and associated works to Coventry Market basement, and removal and relocation of William Mitchell mural from front elevation of the former Three Tuns Public House building in Bull Yard; Outline application: B. For part of the site for the demolition of existing buildings and redevelopment of the land for mixed uses, including details of the layout of new development, with details of scale, access, appearance and landscaping reserved; and C. For part of the site for the demolition of existing buildings and the redevelopment of the land for mixed use, with details of access, layout, scale, appearance and landscaping reserved. The scheme comprises a mixed use redevelopment for residential units (Class C3), a hotel (Class C1), mixed-use non-residential floorspace including Class E Commercial, Business and Service uses, Class F.1 Learning and Non-Residential Institutions, and Sui Generis Pub or Drinking Establishment / Hot Food Takeaway / Cinema uses, hard and soft landscaping and new public open spaces including sustainable urban drainage systems, car parking provision and formation of new pedestrian and vehicular access and stopping up of existing	Outline consent	Proposed Allocation	NB	Residential	**584**	0	0	0	0	0	0	0	0	584	0	0	0	0	0	0	0
304	R/2008/1801	22/10/2009	New Deal for Communities (NDC) - Willenhall, Henley Green, Manor Farm (WEHM)	Demolition of existing housing and associated community and shopping facilities and erection of new dwellinghouses and apartments (up to 3,328 units) with associated open space, local shopping facilities and drainage infrastructure and the stopping-up, diverson and creation of public highway (all matters reserved). | Historic Reference: 54800	Outline consent	Windfall	NB	Residential	**400**	0	0	0	0	0	0	0	50	50	50	50	50	50	50	50	0
305	PL/2023/000051 4/OUTM	22/04/2024	30 Regent Street	Outline application (landscaping details reserved) for residential development to comprise 101 rental apartments with associated communal facilities, landscaped courtyard, parking and turning areas (including re-use with alterations of the existing no. 30)	Outline consent	Windfall	NB	Residential	**101**	0	0	0	0	0	101	0	0	0	0	0	0	0	0	0	0	0
306	OUT/2022/1142	04/11/2022	38 Aylesford Street	Outline application for up to 19 dwellings with all matters reserved.	Outline consent	Windfall	NB	Residential	**19**	0	0	0	0	0	10	9	0	0	0	0	0	0	0	0	0

No.	Planning app	Decision date	Location	Proposal	Status	Supply type	Dev type	Tenure type	Remaining capacity	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41
307	OUT/2022/1700	01/12/2023	Peri-peri, 6 Carter Road	Outline application with landscaping reserved for the demolition of 6 - 10 Carter Road and erection of 12 apartments and associated parking. (Resubmission of OUT/2021/3127).	Outline consent	Windfall	NB	Residential	**12**	0	0	0	0	0	12	0	0	0	0	0	0	0	0	0	0
308	OUT/2022/1753	20/12/2023	Land At Corner Of Cedar Avenue And Max Road	Outline planning application with Landscaping reserved and Access, Appearance, Layout and Scale submitted in detail for the erection of seven one-bedroom flats and associated parking, amenity space and landscaping	Outline consent	Windfall	NB	Residential	**7**	0	0	0	0	0	5	2	0	0	0	0	0	0	0	0	0	0
309	OUT/2022/2261	17/10/2022	296 Westwood Heath Road	Erection of one new dwelling (outline - layout, scale and access only)	Outline consent	Windfall	NB	Residential	**1**	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0
310	PL/2024/000099 4/OUT	23/07/2024	1 Sefton Road	Outline application for Erection of 1 no. 1 bedroom dwelling with details of associated parking and access from Merynton Avenue (all other matters reserved)	Outline consent	Windfall	NB	Residential	**1**	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
311	PL/2024/000057 2/PAMA	12/06/2024	Oakwood House St Patricks Road	PAMA Application to determine if prior approval is required for a proposed change of use from commercial, business and service (use class E) to dwellinghouses (use class C3)	Permitted development	CCAAP	NB	Residential	**20**	0	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0
312	PAO/2021/2900	11/11/2021	[Ground floors and 1st floor] 55 Corporation Street	Prior Approval change of use from Class E (c) financial services / E(g (i)) offices to Class C3 residential use.	Permitted development	CCAAP	COU	Residential	**6**	0	0	0	0	6	0	0	0	0	0	0	0	0	0	0	0
313	PL/2024/000087 6/PAPD	19/06/2024	Trafalgar House, Meadow Street, Milestone House, Kerry House Windsor Street [Spon End]	Prior Notification of proposed demolition	Permitted development	Proposed Allocation	DEM	Residential	**(158)**	0	0	(158)	0	0	0	0	0	0	0	0	0	0	0	0	0
314	PL/2024/000201 8/PAPD	26/11/2024	William Malcolm House Attoxhall Road	PAPD Application to determine if prior approval is required for a proposed: Demolition of Buildings	Permitted development	HELAA/SH LAA	DEM	Residential	**(112)**	(112)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
315	PL/2024/000082 4/PAMA	24/06/2024	Sutherland House Matlock Road	Prior approval for proposed change of use from office (Use Class E) to 102 residential apartments (Use Class C3)	Permitted development	Windfall	COU	Residential	**102**	102	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
316	LDCP/2021/2693	29/10/2021	33 Four Pounds Avenue	Application for Lawful Development Certificate (LDC) for the proposed change of use from an existing maisonette to a small scale C4 HMO for 5 occupants.	Permitted development	Windfall	COU	HMO/Resi	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
317	PL/2023/000107 7/PAMA	18/07/2023	358-360 Aldermans Green Road	Application for prior approval for the conversion of existing shop into two dwellings.	Permitted development	Windfall	COU	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
318	PL/2024/000135 3/PAG	27/08/2024	124 Albany Road	Convert first floor and second floor into residential use 2x 1 bed 1 person flats with shared access to the building	Permitted development	Windfall	COU	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
319	PL/2024/000135 1/PAG	27/08/2024	126 Albany Road	Convert first floor and second floor into residential use 2x 1 bed person flats with shared access to the building	Permitted development	Windfall	COU	Residential	**2**	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
320	PAM/2022/0052	09/09/2022	2 Holbrook Lane	Prior approval for change of use from commerical use (Use Class E) to 1 x 1-bedroom flat (Use Class C3)	Permitted development	Windfall	COU	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
321	PL/2023/000119 8/PAMA	11/09/2023	21 Parkhill Drive	PAMA Application to determine if prior approval is required for a proposed change of use from commercial, business and service (use class E) to dwellinghouses (use class C3)	Permitted development	Windfall	COU	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
322	PL/2024/000022 9/PAQ	22/03/2024	Slashpitts Farm Wall Hill Road	Prior approval application for change of use to existing barn to dwellinghouse	Permitted development	Windfall	COU	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
323	PL/2024/000060 2/PAMA	23/05/2024	173a -175a Ansty Road	Application for Prior Approval for a proposed change of use of the first floor from Commercial, Business and Service (Use Class E) to Residential Apartment (Use Class C3).	Permitted development	Windfall	COU	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
324	PL/2024/000119 1/PAQ	15/08/2024	Agricultural Barn Hazel Grove Farm Hollyfast Lane, CV7 8AB	Prior approval application for conversion of The Barn to one dwelling (C3)	Permitted development	Windfall	COU	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0

No.	Planning app	Decision date	Location	Proposal	Status	Supply type	Dev type	Tenure type	Remaining capacity	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41
325	PL/2024/0001349/PAC	27/08/2024	122 Albany Road	Convert first floor and second floor into residential use 1x 1 bed 2 person flat	Permitted development	Windfall	COU	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
326	PL/2024/0001229/PAMA	10/09/2024	73a Biggin Hall Crescent	PAMA Application to determine if prior approval is required for a proposed change of use from commercial, business and service (use class E) to dwellinghouses (use class C3)	Permitted development	Windfall	COU	Residential	**1**	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
327	PL/2024/0002565/LDCP	21/02/2025	186 Norman Place Road	Lawful Development Certificate for proposed change of use from C3 dwelling house to C4 3-person HMO	Permitted development	Windfall	COU	HMO/Resi	**1**	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
328	PL/2024/0000248/PAPD	05/03/2024	27 Westwood Heath Road	PAPD Application to determine if prior approval is required for a proposed: Demolition of Buildings	Permitted development	Windfall	DEM	Residential	**(1)**	0	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
329	PL/2024/0002256/LDCP	14/01/2025	10 John Murphy Gardens	Lawful Development Certificate for proposed change of use from a dwellinghouse C3(a) to a children's home C3b for a maximum of two children with a live in carer.	Permitted development	Windfall	COU	Residential	**(1)**	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
330	FUL/2021/3802	02/03/2022	99-100 Spon End	Change of Use from a single dwellinghouse (Use Class C3) to provision of medicial or health services (Use Class E).	Expired	Windfall	COU	Residential	**(1)**	(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
									13,540	1,329	1,724	2,158	1,218	1,349	1,163	673	693	1,086	440	302	301	301	301	301	201
													1-5yrs	**7778**				**6-10yrs**	**4055**						**11+ yea**

Coventry Local Plan Review 2021-2041: Proposed Submission Regulation 19 Consultation

Sustainability Appraisal (SA)/ Strategic Environmental Assessment (SEA) SA Report

October 2024

Coventry Local Plan Review 2021-2041: Proposed Submission Regulation 19 Consultation

SUSTAINABILITY APPRAISAL (SA) (incorporating Strategic Environmental Assessment SEA)

SA Report:

date:	May 2023 Initial August-September 2024 Drafts October 2024 Final	
prepared for:	Coventry City Council	
prepared by:	Barbara Carroll Dr Trevor Turpin	Enfusion
quality assurance:	Barbara Carroll	Enfusion

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NON-TECHNICAL SUMMARY (NTS)

This is the NTS of the Sustainability Appraisal (SA) Report

1. This is the NTS of the SA Report documenting the processes of Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) within an integrated appraisal for the Coventry Local Plan Review (CLPR, 2021-2041). This summary is an integral part of the SA Report that accompanies the proposed submission draft of the plan for Regulation 19 public consultation in autumn 2024. It provides an outline of the SA process and findings in non-technical summary.

The Coventry Local Plan Review (CLPR) 2021-2041

2. The Coventry Local Plan 2021-2041 covers the entire administrative boundary for Coventry City Council, extending beyond the city centre, and located some 15 km to the south-east of Birmingham. Since the current Local Plan was adopted in 2017, there have been various wider reaching changes in both the national and local contexts, including major changes to climate change and environmental requirements. The longer term effects of Brexit and the Covid pandemic are still uncertain, for example, on patterns of working.

3. The Local Plan Review comprises chapters and policies in a similar format and numbering to the adopted Local Plan -Introduction, Overall Growth & Duty to Cooperate, Health & Wellbeing, Jobs & Economy, Housing, Retail & Town Centre Uses, Communities, Green Belt & Green Environment, Design, Heritage, Accessibility, Environmental Management, and Implementation/Monitoring. The current City Centre Area Action Plan has been updated and relevant elements (some are out of date now and some would be duplication) carried across to the new plan as a separate chapter. The overall development needs are set out to be a minimum of 29,100 additional homes and a minimum of 60 hectares of employment land.

Sustainability Appraisal (SA)

4. The purpose of Sustainability Appraisal is to promote sustainable development through the integration of environmental, social, and economic considerations in the preparation of a Local Plan. SA is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects.

5. Initially the scope of the SA is determined by establishing the baseline conditions and context of the area, and by identifying issues, problems and opportunities. From this information, a SA Framework of objectives for sustainable development is prepared. This is relevant to the Coventry local authority area and the issues for

the Local Plan review, and it then forms the basis against which the draft plan is assessed.

Sustainability Characteristics of the Coventry City Area & Likely Evolution without the Local Plan Review

6. The population of Coventry is predicted to increase to 422,919 by the year 2031 and to 454,534 by the year 2042 and, in line with the rest of England, there are more people in older age groups. Over the past decade, the city has become increasingly ethnically diverse with just under half of its school-aged population from an ethnic minority background. Whilst there have been improvements, there are pockets of deprivation and poor health/wellbeing in parts of the area and this limits people's opportunities to succeed in life.

7. Much of Coventry's housing stock is small, old and not built to modern energy efficiency standards. This means that many residents are living in damp, poorly insulated homes, and pay too much to keep warm. Migration is another factor affecting the housing needs. Before the pandemic, Coventry had experienced strong economic growth with particular skills in advanced manufacturing and engineering, but there have been challenges since brexit and Covid-19. Tourism is also important, and the city is home to two successful universities.

8. The city has air quality problems, mostly associated with pollution from vehicles. Noise is a common problem – also from transport, and also light – for both people and wildlife. Pollution from wastewater remains a problem for water quality. Some of the new development completed has been on previously developed land, thus protecting agricultural land and greenfield. The city centre is generally well connected, including for sustainable transport but could be further improved to better encourage more active travel and linkages with green ways for cycling and walking.

9. Coventry has a range of unique historic sites and features that give the area its distinctive characters and cultural identity. The landscapes in the area are valued for their scenic qualities, rich wildlife, cultural associations and historic values. Coventry has many habitats associated with the built environment, and there are nationally designated sites for scientific interest, local nature reserves, and areas of ancient woodland. The area is also rich in the water environment with rivers, canals and waterbodies that form an important biodiversity network.

10. Without review of the Local Plan, there are likely to be some changes anyway in the sustainability characteristics of the Coventry area, for example, the increasing use of electric cars, and new standards for green infrastructure will lead to reduced greenhouse gas (GHG) emissions, improvements in air quality, and some recovery for the loss of nature and biodiversity.

11. However, the predicted increase in population, will challenge the ability of the Council and its partners to accommodate such changes for the quality of life of its citizens, and to be able to provide the right mix and type of homes in the most suitable locations. Without guidance from an updated Local Plan, the adverse effects from development, including cumulative effects, would not be managed

effectively. Opportunities from new development, such as improving accessibility to green space and enhancing townscape quality/character, would not be realised or optimised – including contributing towards reducing health inequities.

How has the Coventry Local Plan Review been assessed?

12. The SA Framework, together with the baseline information, and professional judgment comprised the basis for assessment, and is summarised in the following table:

SA Objective
SA No 1: To enable vibrant and inclusive communities
SA No 2: To provide accessible essential services and facilities for all residents
SA No 3: To improve health and promote active living
SA No 4: To provide decent and affordable housing for all
SA No 5: To support sustainable inclusive economic growth
SA No 6: To help achieve the Council's ambition to reach net zero carbon emissions
SA No 7: To build resilience to climate change
SA No 8: To reduce traffic & improve sustainable transport choices
SA No 9: To reduce air, noise & light pollution
SA No 10: To protect & conserve natural resources - soil, water, minerals & waste
SA No 11: To protect and enhance nature & biodiversity
SA No 12: To protect and enhance the historic environment, and its setting
SA No 13: To protect and enhance the quality and character of townscapes and landscapes

13. The significance of effects was assessed using the categories, as follows:

Symbol	Meaning
- -	Major Negative
-	Minor Negative
+	Minor Positive
++	Major Positive
?	Uncertain
0	Neutral or Negligible

What reasonable alternatives have been considered & addressed?

14. During the progression of initial technical studies and early development of issues and options for plan-making, certain strategic options were identified and tested with high level appraisal using the SA framework of objectives, as follows:

    - Amount of Housing
    - Density of Housing
    - Climate Change & Standards for Building Regulations (2 options)
    - Standards for Biodiversity Net Gain (BNG) & Green Infrastructure (GI) (2 options)

15. The SA made suggestions for mitigating likely negative effects and for enhancing any likely positive effects to inform the plan-making. It should be noted that there can be much uncertainty of the significance of effects at the strategic level, particularly for issues associated with climate change.

16. The Council considered the comments made during the initial consultation of the Issues & Options, further evidence studies, and the findings of the SA in order to identify and refine any further strategic options that should be tested through SA. The amended and additional strategic options that were tested through SA are, as follows:

    - Amount of Housing (5 options)
    - Density of Housing (3 options)
    - Development in the Green Belt (2 options)
    - Amount of Employment Land (3 options)
    - Amount (3 options) & Distribution of Office Development (3 options)
    - Purpose Built Student Accommodation (PBSA) (2 options)

17. These strategic options were tested through SA using the SA framework of objectives and in a comparable and consistent manner. The findings of the SA, the comments made during consultation, and the findings of further technical studies informed the Council in its selection and rejection of options. The draft Local Plan includes those strategic options that have been tested and identified as the preferred approaches to plan-making.

18. **Amount of Housing**: Options 1 & 2 were found to have significant negative effects for many topics because the high numbers of dwellings would compromise the ability to meet with other objectives, especially for climate change and nature. Homes would have to be small and more densely located with less possibility to meet variety and adaptability of needs. Option 3 for 29,100 new homes was the preferred option as this aligns with the identified local housing needs and can be accommodated within the Coventry Council area and allows for a buffer over the plan period.

19. **Density of Housing**: Options 1 & 2 were found to not be able to accommodate the development needs. Option 3 identified four different areas according to their local character and ability to accommodate different densities of housing – and this is the preferred approach.

20. **Climate Change & Building Regulations Standards**: Compliance with national minimum standards for energy uses of new buildings as set out in Option 1 will be mandatory for the updated plan. However, such standards are unlikely to sufficiently progress the objectives for reducing greenhouse gas emissions in the Coventry Climate Change Strategy to 2030. Therefore, the Council progressed Option 2 – over and above the proposed new Building Regulations – seeking opportunities to progress towards net zero carbon beyond that controlled through Building Regulations.

21. **Nature & Biodiversity**: It was decided that a flexible approach to achieve the best outcomes through national standards is more effective than requiring standards higher that those at the national level. The Council has been applying a 10% gain in BNG for some time and this is working well with other initiatives.

22. **Development in Green Belt**: The Green Belt is very important for the Coventry plan area – it prevents urban sprawl, protects green and open space, retains openness, protects the landscapes and character of settlements. As the identified need for housing can be accommodated, the preferred approach is to avoid any development in the Green Belt, as set out in Option 2.

23. **Amount of Employment Land**: Option 1 is too high to be accommodated within the constrained boundaries of the Coventry plan area. Option 3 would result in development in the Green Belt and therefore, is not taken forward. Option 2 can be accomodated without resorting to Green Belt release and is the preferred option.

24. **Amount of Office Land**: Options 1 & 2 reflect earlier calculations of the amount of land needed for office; Option 3 is the preferred option that takes into account oversupply and reduced requirements due to changed patterns of working.

25. **Distribution of Office Land**: Option 3 with land to the City Centre and to local centres is the preferred approach as it supports a range of needs including smaller businesses.

26. **Purpose Built Student Accommodation**: Option 2 that limits student housing primarily to the city university area and the university campus is the preferred option as the student populations are more focused in more sustainable locations. It is also a more effective use of land for other housing needs.

27. The Council reviewed the status of the site allocations in the adopted Local Plan as some have been developed, some are being developed, some are consented, and others not yet started. The Council identified that 25 housing and mixed use sites, and 7 employment sites, were still suitable and should be retained in the Local Plan Review.

28. The Council assessed the site options that had been proposed through the calls for sites and found 12 new sites that were suitable and deliverable. All these sites were subject to SA and taken forward as proposed site allocations for housing and mixed use development. There was one new employment site that was being promoted and this was tested through SA. The site assessment process and the SA found that there would be negative effects for agricultural land, soils and

the Green Belt – and for these reasons, the site has not been taken forward into the new Local Plan.

What are the Likely Significant Effects of the draft Coventry Local Plan Review to 2041? How could negative effects be mitigated?

29. The population of Coventry is predicted to increase and the Council has investigated how much housing and new development will be needed. The Council has prepared the draft Plan to support the Vision and priorities in the One Coventry Plan and the priorities in the draft Climate Change Strategy. The Coventry Local Plan area is heavily built-up, comprising a city centre that is rich with cultural and historical assets, surrounded by an urban area which is then defined by the encircling Green Belt land that is so important to prevent urban sprawl and coalescence. These characteristics constrain the opportunities for new development, so the Council identified updated character areas for the City Centre to better guide new development. It also identified four zones – greenfield, brownfield, city centre transition, and city centre – that better reflect precedent and context such that different densities of housing can be accommodated more sustainably with positive effects. The updated approach to development in the City Centre will support objectives for economic growth and regeneration with wider positive effects.

30. Taking into account these local circumstances, the Council has assessed that the identified need for housing and employment land can be accommodated within the urban environment and avoiding the Green Belt with significant positive effects. Good quality housing and access to employment is well established as contributing to better health and wellbeing – both physical and mental – and indicating further significant positive effects. Housing policies cover the needs of different types of people, including the young, older persons, those with special needs, students and travellers. This all contributes to positive effects for inclusive communities. Affordability is a key element of the new Plan and also adaptability and flexibility to be able to adjust to changing needs – all with significant positive effects.

31. The location and type of new development can have effects for communities and the Plan allocates sites for new development that are within good access of services and facilities. This provides mitigation measures to avoid significant negative effects. Development sites were also chosen to be easily accessible to public transport, cycling and walking routes and this will have positive effects for reducing dependence on car travel and increasing sustainable and active travel with positive effects for health and wellbeing. Transport policies further guide new development, encouraging active travel and reduce reliance on the private car, thus supporting the Council's emphasis on prioritising sustainable travel with positive effects for health and wellbeing.

32. Aiming to address the effects of climate change is a key feature of the updated Plan with new policies that reflect the new requirements for net zero carbon and Building Standards. Information and guidance is provided for new development such that in the longer term, the cumulative effects should be positive for climate change and people's health and wellbeing.

33. Updating of policies on the design of new development provide mitigation measures to ensure that potential negative effects are avoided and that possible positive effects are included. The historic environment continues to be protected and enhanced by policies that provide strong mitigation measures. The local townscapes and landscapes, including the important historic city centre and Arden rural environment, continue to be protected and enhanced by relevant polices that provide strong mitigation measures. The avoidance of new development in the Green Belt provides mitigation to avoid negative effects from urban sprawl and on communities by keeping open space. This is particularly important for the constrained land area for the Coventry Local Plan.

34. There is the potential for the overall scale of new development to have negative effects on nature and biodiversity. However, updated polices reflect the new national requirement that all development must provide at least 10% biodiversity net gain – with overall positive effects. Policies provide information and guidance of how development can link new green and blue infrastructure to benefit both nature and people with significant positive effects on health and wellbeing.

35. Strong policies remain in the Plan to reduce pollution and protect natural resources. Polices on design, air quality, light, and noise provide strong mitigation measures to avoid significant negative effects. Site allocations have been selected on previously developed land, thus making effective use of the land resources and avoiding negative effects on soils and greenfield land. Policies remain in the Plan for waste management and minerals development such that potential negative effects are mitigated.

36. All these factors are interconnected and contribute to helping Coventry achieve its ambitions for addressing the climate crisis and supporting the One Coventry Vision through mitigating potential negative effects and encouraging possibilities for positive effects.

Were there any difficulties encountered?

37. There were no significant technical difficulties encountered during the preparation of this SA. There are inherent difficulties in predicting the likely future baseline and assumptions were made using professional judgment. Some uncertainties were identified – in particular for the significance of effects for climate change and with regard to nature and biodiversity.

How has the SA influenced the draft Coventry Local Plan?

38. The SA made suggestions for improving the sustainability of the Plan, especially at the early stages of the plan preparation with the assessments of the strategic options for amount of housing and the density of housing. Overall, the findings of the SA were taken into account as the draft Plan was further developed.

Consultation

39. The Initial SA Report (May 2023) was published alongside the Issues & Options draft Coventry Local Plan Review for Regulation 18 consultation in 2023. Comments were received from the statutory environmental bodies - Natural

England and Historic England. Comments were also received from a developer who had concerns that development should be considered in the Green Belt. These comments were taken into account during the preparation of this SA Report. The draft Coventry Local Plan Proposed Submission is being published for Regulation 19 consultation and this SA Report accompanies the draft Plan.

Monitoring Proposals

40. Local planning authorities are required to produce Monitoring Reports (MRs) including indicators and targets against which the progress of the Plan can be assessed. There is also a requirement to monitor the predictions made in the SA and Government advises Councils to prepare a monitoring strategy that incorporates the needs of the two processes to make best use of shared information and resources. The Coventry City Council monitoring strategy for the Local Plan is considered satisfactory for the requirements from the SA process.

Next Steps

41. Any comments on the SA will be submitted with the draft Plan and other evidence to the Secretary of State so that an independent planning inspector may be appointed for the Local Plan and its supporting evidence to be examined in public in due course.

1.0 INTRODUCTION

Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)

1.1 Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. The purpose of a Sustainability Appraisal is to promote sustainable development through assessing the extent to which an emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic, and social objectives[1].

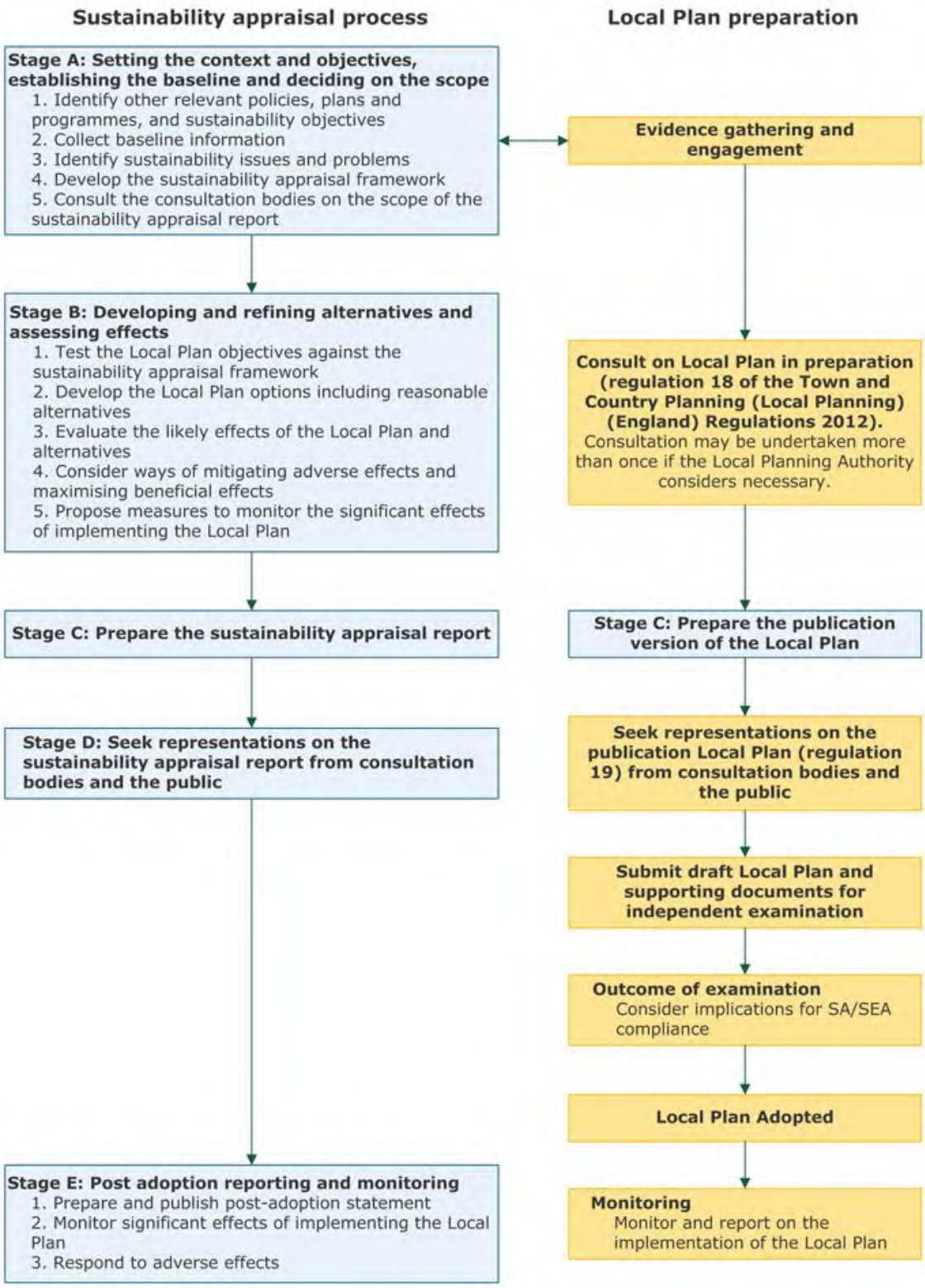
1.2 The requirement for SA is set out in Section 19 of the Planning and Compulsory Purchase Act 2004 and in paragraph 32 of the National Planning Policy Framework (NPPF, updated 2023)[2]. SA incorporates the requirements for Strategic Environmental Assessment (SEA,) as set out in the Environmental Assessment of Plans and Programmes Regulations 2004[3]. Coventry City Council has commissioned independent specialist consultants Enfusion Ltd to undertake the SA process for the Coventry Local Plan Review CLPR 2021 - 2041.

1.3 National planning practice guidance sets out the key stages and tasks for the SA process and their relationship with the Local Plan process – as illustrated in the following Figure 1.1. It is important to note that SA is an iterative and on-going process. Stages and tasks in the SA process may be revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses.

1.4 This SA Report explains the Stage A Scoping that has been undertaken and sent to the statutory consultation bodies in accordance with good practice. It reports the findings of Stage B Alternatives & Assessment and comprises Stage C Preparation of the SA Report. This SA Report accompanies the Coventry Local Plan Review Regulation 19 Draft Plan for statutory public consultation and seeks comments from the public, stakeholders and the statutory consultees.

[1] https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#strategic-environmental-assessment-and-sustainability-appraisal
[2] https://www.gov.uk/government/publications/national-planning-policy-framework--2
[3] https://www.legislation.gov.uk/uksi/2004/1633/contents/made

Figure 1.1: SA and Plan-making Stages and Tasks



Habitats Regulations Assessment (HRA)

1.5 Coventry City Council is also required to undertake a Habitats Regulations Assessment (HRA)[4] of the Local Plan Review.[5] The Conservation of Habitats & Species Regulations (2017, amended 2018)[6] afford a high level of protection to sites in a network of internationally important sites designated for their ecological status. These sites comprise European Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), and Ramsar[7] sites. It is a requirement to consider if the plan is likely to have significant effects on the integrity of any relevant designated site.

1.6 HRA is a two staged process – initially screening and then appropriate assessment (if significant adverse effects are screened as likely). Planning practice guidance advises that an SA should take account of the findings of an appropriate assessment, if one is undertaken. HRA screening for the CLPR has been undertaken separately and the findings of the HRA taken into account in the SA.

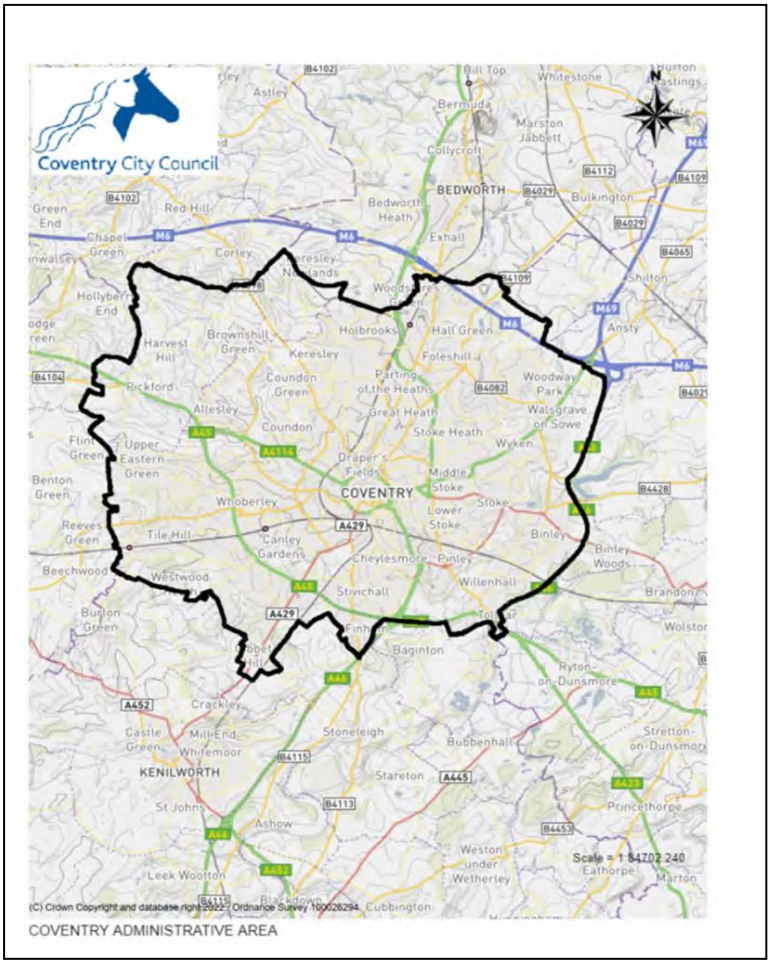
The Coventry Local Plan Review 2021-2041 (CLPR)

1.7 The Coventry Local Plan 2011-2031 and City Centre Area Action Plan 2011-2031(CCAAP) (both adopted 2017), together with national planning guidance (NPPF), Development Plan Documents (DPDs), Supplementary Planning Guidance (SPDs), and Neighbourhood Plans (NPs), comprise the planning framework through which decisions are made on planning applications. The Government currently requires that the policies of an adopted Local Plan should be reviewed every five years to check that they are up to date.

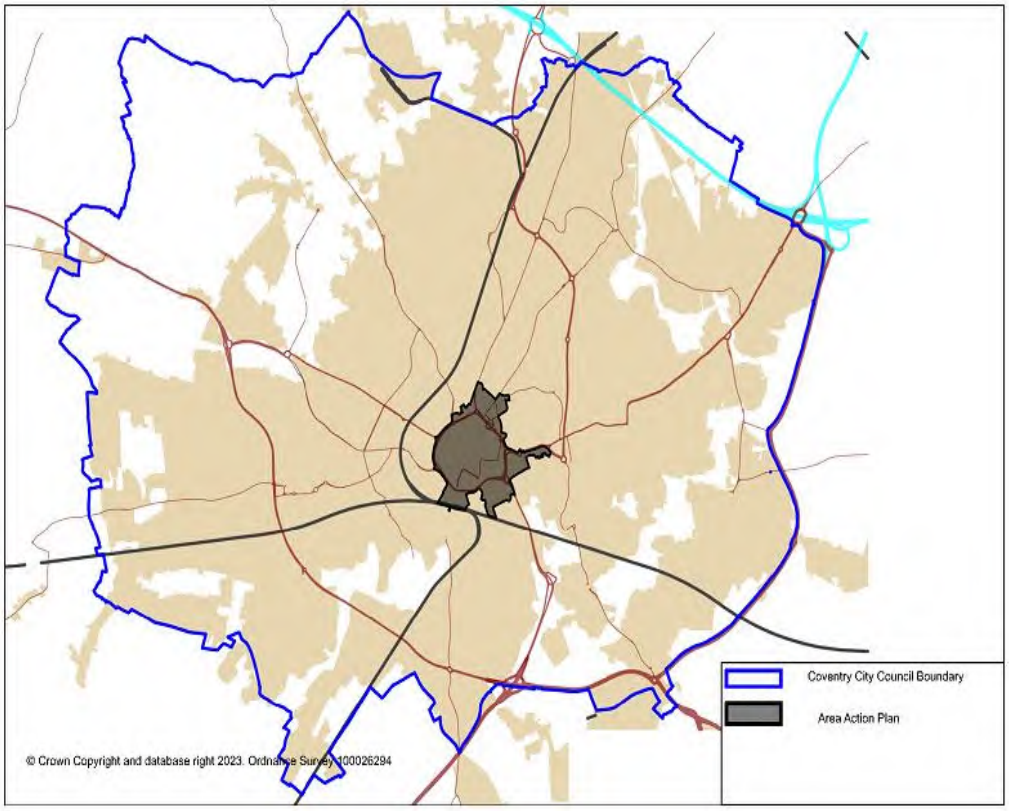
1.8 It may be noted that the review of the CLP is being carried out during times of proposed planning reform and these changes could have a profound impact on development plans and projects. During 2020-2021, Government consulted on proposed changes to the planning system with revisions to the NPPF, the National Model Design Code and changes to the standard method for assessing local housing need. The Levelling-Up & Regeneration Act (LURA, 2023)[8] enacted the changes and introduced national development management policies (NDMPs). The new Government has proposed different changes to the NPPF (July 2024)[9] and transitional arrangements. These proposals are now being consulted upon until 24 September 2024.

1.9 The Coventry Local Plan covers the entire administrative boundary for Coventry City Council with an area of 99km^2 located in central England, approximately 15km south east of Birmingham and approximately 10km north of Leamington Spa – and as shown in the following figures:

[4] https://www.gov.uk/guidance/appropriate-assessment
[5] https://www.gov.uk/guidance/appropriate-assessment
[6] https://www.legislation.gov.uk/uksi/2017/1012/contents/made
[7] Support internationally important wetland habitats and are listed under the Ramsar Convention on Wetlands of International Importance
[8] https://www.legislation.gov.uk/ukpga/2023/55
[9] https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system



Figures 1.2 & 1.3: Location of the Coventry Local Plan area



1.10 In consideration of the significant changes associated with Government calculations for housing need, as well as major changes to climate change and environmental requirements, the Council approved a full review of the Local Plan in December 2022. Since the Plan was adopted in 2017, there have been various wider reaching changes in both the national and local contexts, including effects of Brexit and the Covid pandemic. The Council's priorities now include the One Coventry Plan and the emerging Climate Change Strategy. It was decided that it was more effective to undertake a full rather than a partial review.

1.11 Many of the policies in the adopted LP are still relevant and needed only minor amendment or updating. Key policy areas have been updated in line with new national requirements and new evidence, most notably associated with the Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA, November 2022)[10]. This strategic study has been prepared to provide a joint and integrated assessment of the need for housing, economic growth potential and employment land needs for the city and the county. Other key evidence includes the Housing & Employment Land Availability Assessment (HELAA, 2024), the Residential Density Study (2024), and the Green Belt Technical Review (2024).

1.12 The studies for the preparation of the Local Plan Review indicated the possibilities for certain different strategic options for policies. These were determined to be reasonable alternatives such that they were investigated through the SA process. Strategic options were identified for the quantum of housing development, the density of housing, standards for Building Regulations, standards for Biodiversity Net Gain (BNG) and Green Infrastructure (GI), development in the Green Belt, the quantum of employment land, the quantum and distribution of office development land and the location of Purpose Built Student Accommodation (PBSA).

1.13 The draft Plan published for Regulation 19 consultation has considered the updated evidence, reviewed the extant policies, explored the issues and options arising, and considered the comments received from the Regulation 18 public consultation. The Plan aligns with the contents of the adopted Local Plan and comprises chapters, supported by appendices, as follows:

Introduction
1 Overall Development Needs & the Duty to Co-operate
2 Health & Wellbeing
3 Jobs & Economy
4 Housing
5 Retail & Town Centre Uses
6 Communities
7 Green Belt & Green Environment
8 Design
9 Heritage
10 Accessibility
11 Environmental Management

[10] https://www.coventry.gov.uk/planning-policy/local-plan-review/3

12 Coventry City Centre
13 Infrastructure, Implementation & Monitoring

1.14 The CLPR Policies with an outline of updating are listed in the Table 1.1, as follows:

Table 1.1: CLPR Policies – Summary of Review Changes

CLPR Policy	Summary of Changes
DS1: Overall Development Needs	**Strategic Policy** - Reflects change in quantum of development for period 2021-2041 – minimum of 29,100 additional homes & minimum of 60 hectares of employment land within the city's administrative boundary
DS2: Duty to Cooperate & Partnership Working	**Strategic Policy** - Updated
DS3: Sustainable Development	**Strategic Policy** - Updated
DS4 Parts A, B, C & D Masterplan Principles	**Strategic Policy** - Minor updating
HW1: Health & Health Impact Assessments	Updated to broaden scope & align with updated SPD
JE1: Economy & Employment Strategy	**Strategic Policy** - Updated to reflect national changes & local evidence
JE2: Provision of Employment Land & Premises	**Strategic Policy** - Updated – 52 hectares of land allocated for employment development within the city's administrative area, plus 27,100 sq m remaining floorspace at Friargate as part of wider mixed use allocation
JE3: Non-Employment Uses on Employment Land	Changes to context for policy application
JE4: Location & Type of Office Development	Updated to reflect national policy change and local evidence
JE5: Industrial & Storage Distribution Development	Previous JE5 split into 2 policies – JE5 Industrial and Storage and a new JE8 to focus on R&D
JE6: Tourism/Visitor-Related	Minor updating
JE7: Accessibility to Employment Opportunities	Updating to 'developer contributions'
JE8: Location of Research & Development (R&D)	New policy recognising that R&D has different locational needs
H1: Housing Land Requirements	**Strategic Policy** - Updated needs for 2021-2041 for a minimum of 29,100 additional dwellings
H2: Housing Allocations	**Strategic Policy** - Updated including status of remained allocations (some being developed, some consented, some not started), & new identified sites
H3: Provision of New Housing	Significant updating to reflect changes in national standards & legislation and local evidence

H4: Securing a Mix of Housing	Updating in line with HEDNA
H5: Managing Existing Housing Stock	Updated with latest climate change requirements & including emphasis on re-use & support for retrofitting
H6: Affordable Housing	Updated , including in line with HEDNA need (provision, tenure, housing size)and local evidence
H7: Gypsy & Traveller Accommodation	Updated in line with local evidence
H8: Specialist Housing, Older Persons Accommodation & Hostels	Updated & strengthened to widen scope and require accessibility & adaptability standards
H9: Residential Density	Changed policy that better reflects local character & context with four densities proposed – greenfield, brownfield, city centre transition zone, and city centre
H10: Student Accommodation	Updated policy in line with local evidence, restricting to areas close to the universities and encouraging better standards & including provision for adaptability of residences
H11: Homes in Multiple Occupation	Updating to reflect, and link to the new HMO DPD
H12: Build to Rent Housing	New Policy
H13: Co-living	New Policy
R1-R6 Retail Policies	Updating to reflect national policy & the Retail Study local evidence
CO1-3 Community Policies	Minor updating
GB1: Green Belt	**Strategic Policy** - Updating & new policy to differentiate between Green Belt & Local Green Space
GB2: Safeguarded Land in the Green Belt	**Strategic Policy** – Retained pending progress of the South Warwickshire Local Plan
GB3: Local Green Space	Updating & new policy to differentiate between Green Belt & Local Green Space
GE1: Green & Blue Infrastructure	Updated to reflect local strategy and national change
GE2: Green Space	Minor updating to reflect national change and local evidence
GE3: Biodiversity, Geological, Landscape & Archaeological Conservation	Differentiation & updating to include statutory 10% net gain biodiversity. Removal of archaeology as this will have its own separate policy.
GE4: Tree Protection	Updated & strengthened
DE1: Ensuring High Quality Design	Major revision requiring all development to follow a design-led approach; links to the Tall Buildings SPD & emerging City Wide Design Code

DE2: Delivering High Quality Places	New Policy including public realm, public art, lighting – and local context for City Centre & City Centre Transition areas
HE1: Conservation Areas	Minor updating
HE2: Conservation & Heritage Assets	Updating and strengthening
HE3: Heritage Park – Charterhouse	No change
HE4: Archaeology	New Policy to disaggregate archaeology from HE2 for clarity & detail
AC1: Accessible Transport Network	Significant updating to reflect national policy & guidance & the Council's emphasis on prioritising sustainable travel
AC2: Road Network	Updating to reflect latest transport strategy
AC3: Demand Management	Updated to reflect national policy & guidance & the Council's emphasis on prioritising sustainable travel, including mobility credits
AC4: Active Transport Provision including Walking, Cycling & Micro Mobility	Significant updating to reflect national policy & guidance & the Council's emphasis on prioritising sustainable travel
AC5: Bus & Rapid Transit	Significant updating to reflect national policy & guidance & the Council's emphasis on prioritising bus and rapid transit use
AC6: Rail	Minor updating to reflect current context
AC7: Freight	Updating to ensure better management of freight and management of HGV movements including parking, facilities, consolidation.
EM1: Planning for Climate Change Adaptation	Significant updating to strengthen strategic approach; refers to the Coventry Heat Network
EM2: Building Standards & EM3: Renewable Energy Generation	Policies deleted & replaced by EM11-EM14
EM4: Flood Risk Management	Minor updating to reflect national and local context
EM5: Sustainable Drainage Systems (SuDS)	Updated to reflect national legislation & policy
EM6: Redevelopment of Previously Developed Land	Updating to reflect Water Cycle Study (2024)
EM7: Air Quality	Minor updating
EM8: Waste Management	No change
EM9: Safeguarding Mineral Resources	No change
EM10: Non-Mineral Development in MSAs	No change
EM11: Energy Infrastructure	New Policy to address operational carbon;
EM12: Net Zero (Regulated Operational Carbon) New	New Policy to address operational carbon;

Build Non-Domestic Development	
EM13: Overheating in New Buildings	New Policy
EM14: Embodied Carbon & Waste	New Policy
EM15: Noise	New Policy as noise had not been addressed as an issue in the 2017 Local Plan
IM1: Developer Contributions	Minor updating
CC1 – City Centre Part A Development Strategy; Part B Green & Blue Infrastructure; Part C Drainage & Flood Risk; Part D Environmental Management; Part E Character Areas	Many elements of the adopted Area Action Plan are now incorporated into other CLP Policies; some key elements remain specific to the City Centre and are set out in Policy CC1 (Parts A-E) within a new chapter of the CLP

1.15 It is important to note that the draft plan is not a new local plan – it is a review – and, In particular, the issues and options for the review were framed within the context of changed national requirements, the Council's One Coventry Plan (2022-2030)[11], and the five development pathways to sustainability set out in the draft Coventry Climate Change Strategy (2022-2030)[12]. The subsequent refinements to develop the plan to the Regulation 19 stage took into account the comments made on the initial consultations, further evidence from technical studies, and considered the findings from the SA and the HRA screening.

Purpose and Structure of this SA Report

1.16 This document reports the SA process and its findings from the assessment of the emerging draft Coventry Local Plan Review to 2041. Following this introductory Section 1, this report is structured into further sections:

- Sections 2 explains the approach to the SA, including consideration of reasonable alternatives, the SA Framework and methods
- Section 3 summarises the sustainability context and baseline characteristics with details available in the SA Scoping Report (March 2023)
- Section 4 summaries the findings of the SA of the Strategic Options
- Section 5 summarises the SA Findings for the Proposed Site Allocations
- Section 6 presents the SA Findings for the draft Local Plan
- Section 7 reports the SA Findings for the Implementation of the CLPR as a whole
- Section 8 considers Monitoring and Section 9 sets out the Next Steps

[11] https://www.coventry.gov.uk/onecoventryplan
[12] https://www.coventry.gov.uk/draftclimatechangestrategy

1.17 Technical Appendices provide the detailed findings of the SA. Appendix I comprises the Statement of Compliance with the SEA Directive and provides signposting to where key aspects of the SA/SEA are located in the SA Report. Appendix II is the SA Scoping Report (available separately) and including the details of the baseline evidence and the development of the SA Framework for assessment. Appendix III details the SA of the Strategic Options; Appendix IV reports the consultation comments to the SA at the Regulation 18 stage; and Appendix V details the SA of the Proposed Site Allocations.

2.0 APPROACH & METHODS

The SA/SEA Process & Approach Taken

2.1 Sustainability Appraisal incorporating Strategic Environmental Assessment is an iterative and ongoing process that aims to provide a high level of protection for the environment and to promote sustainable development for plan-making. The role of SA is to inform the Coventry Council as the planning authority; the SA findings do not form the sole basis for decision-making – this is informed also by other studies, feasibility and feedback comments from consultation. SA is a criteria-based assessment process with objectives aligned to the issues for sustainable development that are relevant to the plan and the characteristics of the plan area.

2.2 There is a tiering of appraisal/assessment processes that aligns with the hierarchy of plans – from international, national and through to local. This tiering is acknowledged by the NPPF (updated December 2023) in paragraph 32 that states that evidence should be proportionate. Planning guidance advises[13] that the SA should focus on what is needed to assess the likely significant effects of the plan. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the plan .

Scoping & the SA Framework

2.3 Through the scoping process, the relevant policy context was reviewed, and baseline information was identified, collated and analysed to ensure that key issues and opportunities for the Coventry Local Plan area and relevant for a Local Plan Review were identified. The details of this analysis are presented in the SA Scoping Report (March 2023 and as Appendix II of this Initial SA Report) and a summary is provided in the following Section 3 of this SA Report.

2.4 The use of an SA Framework of objectives is an established method through which the sustainability and environmental effects of a plan can be described, evaluated and any options compared. SA objectives have been identified through the SA scoping process from the information collated in the policy context, baseline analysis, identification of sustainability issues and opportunities, and consultation with the statutory bodies. Each SA objective was further clarified through a number of decision-aiding criteria/questions to aid the appraisal process.

2.5 The SA Framework is, as follows:

[13] https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal

Table 2.1 SA Framework

SA Objective	Decision-aiding criteria (will the option/proposal…)
SA No 1: To enable vibrant and inclusive communities	Reduce the potential for social isolation by encouraging safe social connectivity Have particular regard for potentially disadvantaged groups (cultural, ethnic, poor, ageing, physical & mentally disabled, single parents, carers, travellers, migrants/refugees) Encourage/support community participation in activities & democratic decision-making
SA No 2: To provide accessible essential services and facilities for all residents	Maintain & improve social & community facilities – meet needs of facilities that support new housing Support the provision of and access to education & training opportunities Encourage facilities that are adaptable to future changes in technology Encourage & support people to live healthy, active lives Ensure facilities are accessible to all, including those with physical or mental disabilities Enable & encourage accessibility to green infrastructure network
SA No 3: To improve health and promote active living	Reduce health inequalities Reduce deprivation with particular regard to deprivation pockets in Coventry Promote active living by facilitating active travel & encouraging healthy lifestyles Improve physical health & mental wellbeing for the ageing with better resilience (both physical & cognitive reserve) Create safe neighbourhoods & help reduce crime, including violence especially against women & girls
SA No 4: To provide decent and affordable housing for all	Provide suitable mix & tenure of housing, with particular regard to affordable homes and for younger people including Coliving & HMOs Provide suitable housing for the ageing, including for adaptability & resilience (physical & cognitive) Ensure that the best use is made of existing housing stock Meet the needs of potentially disadvantaged groups, including Travellers, single parents, carers
SA No 5: To support sustainable inclusive economic growth	Promote jobs & skills development Provide access to a range of employment opportunities Renew vitality and viability of local centres Support the retail & leisure sectors to recover/renew after Covid 19
SA No 6: To help achieve the Council's ambition to reach net zero carbon emissions	Promote energy hierarchy – fabric first, reducing energy use, then mitigating residual emissions Incorporated consideration of embodied carbon Support retrofitting of existing development Promote/deliver renewable or low carbon energy generation Proximity of development to sustainable transport see also SA No 8

SA No 7: **To build resilience to climate change**	Take the long term risk of flooding into account Reduce risks from overheating & extreme weather events Provide adaptive techniques in building design such as passive heating/cooling Incorporation of GI measures such as green space & tree planting to support urban cooling see also SA Nos 11 & 13
SA No 8: **To reduce traffic & improve sustainable transport choices**	Reduce the need to travel by private vehicle Discourage car travel Support & improve a strong, inclusive sustainable transport network, including cycling & walking opportunities & buses/taxis with increased uptake for low/zero emission vehicles
SA No 9: **To reduce air, noise & light pollution**	Help to improve air quality – outdoors and indoors Help to reduce noise pollution & avoid noise disturbance Help to reduce light pollution & avoid light disturbance
SA No 10: **To protect &conserve natural resources - soil, water, minerals & waste**	Make use of previously developed, degraded or under-used land Minimise the loss of best & most versatile (BMV) agricultural land Encourage local food through allotments & urban farming Promote efficient use of water resources Avoid loss or sterilisation of mineral resources Maximise the reuse, recycling & composting of waste
SA No 11: **To protect and enhance nature & biodiversity**	Protect, maintain or enhance features of biological importance Contribute to the positive management of local biodiversity & geodiversity sites Contribute to the wider GI networks – green and blue Contribute to opportunities for wildlife to adapt to a changing climate Deliver measurable biodiversity net gain Address any issues from Transport & Air Quality for nitrogen deposition & designated sites & sites of local importance (see also SA No 8)
SA No 12: **To protect and enhance the historic environment, and its setting**	Conserve and/or enhance heritage assets & their setting Respect & strengthen local character, distinctiveness & sense of place Sustain & enhance the significance of heritage assets by encouraging new viable uses Support public accessibility and/or encourage cultural/tourist use consistent with conservation Identify opportunities to focus on heritage assets at risk
SA No 13: **To protect and enhance the quality and character of townscapes and landscapes**	Protect & enhance local character, distinctiveness & sense of place Protect & enhance visual amenity Restore degraded townscapes & landscapes Affect the purposes of the Green Belt

2.7 The SA objectives are aligned with suggested indicators to help guide assessment and potentially for future monitoring purposes, as follows:

Table 2.2 SA Objectives & Suggested Indicators

SA Objective	Suggested Indicators
SA No 1: To enable vibrant and inclusive communities	Indices of Multiple Deprivation (IMD) Provision for potentially disadvantaged people . Community participation
SA No 2: To provide accessible essential services & facilities for all residents	Proximity to, and capacity of, GPs, dentists, healthcare services Proximity to, and capacity of, nurseries, primary & secondary schools Proximity to range of retail, leisure, sports & cultural facilities Proximity to, and availability of, green infrastructure
SA No 3: To improve health and promote active living	Health Index for England Reduction in health inequality Increase in active living Independent living & resilience for the ageing Reduction in crime
SA No 4: To provide decent and affordable housing for all	Provision of housing mix Provision of affordable housing Provision of HMOs, Coliving Provision of student accommodation; PBSAs Meeting Gypsies & Travellers' needs
SA No 5: To support sustainable inclusive economic growth	Delivery of employment space Support for centres & revitalisation/regeneration Number of vacant units Number of unemployed
SA No 6: To help achieve the Council's ambition to reach net zero carbon emissions	GHG emissions Embodied carbon Energy generation/use from renewable or low carbon sources Incorporation of GI
SA No 7: To build resilience to climate change	Location in areas of risk from flooding Provision of sustainable drainage systems Provision of, & connectivity to, GI & Blue Infrastructure Provision of adaptive techniques in building design
SA No 8: To reduce traffic & improve sustainable transport choices	Connectivity & proximity to sustainable transport options – bus, rail, cycle, walking Uptake of parking restrictions to discourage car use
SA No 9: To reduce air, noise & light pollution	NO_2 & PM monitoring data Number of complaints – noise; light
SA No 10: Protect &conserve natural resources - soil, water, minerals & waste	Area of BMV agricultural land Reuse of previously developed or brownfield land Remediation of contaminated land Quality & quantity of water resources Mineral safeguarding areas (MSAs) Waste generation – household, commercial Rates of recycling & composting Capacities of waste management facilities
SA No 11:	% biodiversity net gain (NE draft metric) Provision of, & connectivity to, GI/BI networks Enhancement & provision of long term management

To protect and enhance nature & biodiversity	
SA No 12: To protect and enhance the historic environment, and its setting	Potential impacts on heritage assets & their setting Historic assets on HE's Heritage at Risk Register
SA No 13: To protect and enhance the quality and character of townscapes and landscapes	Reuse of derelict/abandoned buildings Quality of streetscapes & the public realm Sensitivity & visual amenity studies Development in the Green Belt

2.8 The nature of the likely sustainability effects (including positive/negative, duration (short, medium or long term), permanent/ temporary, secondary[14], cumulative[15] and synergistic[16]) were described where possible and reported in the appraisal commentary, together with any assumptions or uncertainties, such as information gaps. Where necessary, the SA made suggestions and recommendations to mitigate any potential negative effects or promote opportunities for enhancement. The appraisal was undertaken using professional judgment, supported by the baseline information and the wider Local Plan evidence base.

2.9 A qualitative approach was established for investigating policy areas/topics, for testing reasonable alternatives, and for assessing the implementation of the plan as a whole. Significance was estimated according to the categories as set out below:

[14] Any aspect of a plan that may have an impact (positive or negative), but that is not a direct result of the proposed plan.
[15] Incremental effects resulting from a combination of two or more individual effects, or from an interaction between individual effects – which may lead to a synergistic effect (i.e. greater than the sum of individual effects), or any progressive effect likely to emerge over time.
[16] These arise from the interaction of a number of impacts so that their combined effects are greater than the sum of their individual impacts.

Table 2.3: Significance Key

Key: Categories of Significance		
Symbol	**Meaning**	**Sustainability Effect**
- -	Major Negative	Problematical & improbable due to known sustainability issues; mitigation difficult and/or expensive
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
+	Minor Positive	No sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing sustainability problem
?	Uncertain	Uncertain or Unknown Effects
0	Neutral Negligible	Negligible effects or not applicable
SA No 10 split cell – first symbol refers to land/soil & water resources; second symbol refers to minerals & waste		

Options in Plan-Making & Reasonable Alternatives in SA/SEA

2.10 The SEA Regulations require that the SEA should consider the effects of "*reasonable alternatives*". Planning Policy Guidance[17] advises that the SA "*needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted*." "*Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made*."

2.11 At the earlier and higher levels of strategic planning, options assessment is proportionate and may have a criteria-based approach and/or expert judgment; the focus is on the key differences between possibilities for scale, distribution and quality of development. At this early stage, the options presented may constitute a range of potential measures (which could variously and/or collectively constitute a policy or aspiration) rather than a clear expression of quantity and quality. Each option is not mutually exclusive and elements of each may be further developed into a preferred option. At the later and lower levels of development planning for site allocations, options assessment tends to be more specific - often focused on criteria and defined thresholds, such as walking/cycling distances to services/facilities.

2.12 During the progression of technical studies and early development of issues and options for plan-making, certain strategic options were identified for initial testing through SA, as follows:

[17] https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal

a. Quantum of Housing
b. Residential Density
c. Climate Change & Standards for Building Regulations
d. Standards for Biodiversity Net Gain (BNG) & Green Infrastructure (GI)

2.13 The SA made suggestions for mitigating likely negative effects and for enhancing any likely positive effects to inform the plan-making. It should be noted that there can be much uncertainty of the significance of effects at the strategic level, particularly for issues associated with climate change.

2.14 The Council considered the comments made during the initial consultation of the Issues & Options, further evidence studies, and the findings of the SA in order to identify and refine any further strategic options that should be tested through SA. The amended and additional strategic options that were tested through SA are, as follows:

- Quantum of Housing
- Density of Housing
- Development in the Green Belt
- Amount of Employment Land
- Amount & Distribution of Office Development
- Purpose Built Student Accommodation (PBSA)

2.15 These strategic options were tested through SA using the SA framework of objectives and in a comparable and consistent manner. The findings of the SA, the comments made during consultation, and the findings of further technical studies informed the Council in its selection and rejection of options. The draft Local Plan includes those strategic options that have been tested and then identified as the preferred approaches to plan-making.

2.16 The adopted Local Plan includes site allocations that were previously subject to the SA. The LP review process has investigated the extant allocations (some built, some being developed, some consented, some not started) to determine which are still relevant and suitable. The Council identified that 25 extant housing sites plus 7 extant employment sites remained suitable and would be retained in the CLPR. From the calls for sites, the Council assessed various development sites that were being promoted and they identified 12 new housing and mixed use sites that were considered to be suitable and deliverable. These have all been taken forward into the updated Local Plan as proposed site allocations. There were no other site options found through the assessment process to be reasonable and thus needing testing through SA. One new employment site option was subject to SA.

3.0 SUSTAINABILITY CONTEXT & SUMMARY BASELINE CHARACTERISATION

Introduction

3.1 In order to establish a clear scope for the SA of the CLPR, it is necessary and a requirement of SEA, to review and develop an understanding of the baseline characteristics and conditions of the plan area and the wider range of plans and objectives that are relevant to the CLPR. The SA Scoping Report (March 2023) for the Local Plan Review considered the baseline conditions and policy context for the plan area that may affect or be affected by the development to be proposed in the emerging draft CLPR. Analysis of this information enabled the SA to identify the key issues and opportunities for sustainable development in the Coventry city area and create sustainability objectives to address these key issues. Full details can be found in the SA Scoping Report[18] (draft January 2023; final March 2023) that comprises Appendix II of this SA Report, and summary baseline characterisations are set out in the Section 3, as follows:

Policy Context

3.2 A comprehensive range of relevant plans and strategies were investigated according to sustainability themes, as follows: Communities, Health & Wellbeing; Housing; Economy; Climate Change; Transport & Air Quality; Natural Resources (Soil, Water, Waste, Minerals); Nature & Biodiversity; Historic Environment; and Townscape & Landscape. Key documents investigated including the following:

National:

National Planning Policy Framework (NPPF, updated 2021, July & December 2023)
Public Health Strategy England 2020-2025
Public Health England (PHE) Health Impact Assessment in Spatial Planning (2020)
Healthy Ageing: applying all our health (2021)
Health Equity in England: The Marmot Review 10 Years On (February 2020) highlights that people can expect to spend more of their lives in poor health; the health gap between wealthy and deprived areas has grown; and place matters. Build Back Fairer: The **Covid-19 Marmot Review** (2022)
Active Travel England (DfT, July 2022)
UK Net Zero Strategy: Build Back Greener (2021) sets out approaches to keep the UK on the path to achieving net zero carbon by 2050
Heat and Buildings Strategy (2021)
Severn River Basin District Flood Risk Management Plan (2015-2021, updated 2022)

[18] Available on the Council's website

A Green Future: Our 25 Year Plan to Improve the Environment (2018, updated 2021) includes actions to reduce pollution by tackling air pollution
Clean Air Strategy (2019) recognises that vehicles are not the only source of harmful emissions and aims for better cleaner technology and changes in behaviour
Environment Act (2021) provides the UK's new framework for environmental protection with new powers to set new binding targets, including for air quality water, biodiversity, and waste reduction/resource efficiency; establishes **Local Nature Recovery Strategies** and a new system for **Biodiversity Net Gain** (BNG, 2023, updated 2024) from development projects
Environmental Improvement Plan (January, 2023) for England includes a commitment that the public should be able to access green space or water, such as woodlands, wetlands, parks and rivers, within a 15-minute walk from their home.
Natural England's Green Infrastructure (GI) Framework (Feb 2023) provides a structure to analyse where greenspace in urban environments is needed most.
Historic England (HE) Championing Heritage Improving Lives Future Strategy (2021) and **Historic England Climate Change Strategy to 2040** (March 2022)
National Design Guide (2019, updated 2021) sets out the characteristics of well-designed places and demonstrates what good design means in practice
Building for a Healthy Life (BHL) updates and refines the BHL12 design code with its 12 considerations to help people improve the design of new & growing neighbourhoods

Regional & Local:

One Coventry Plan (CCC, 2022-2030)
Coventry Joint Needs Assessment (JNSA, 2019)
Coventry Health and Wellbeing Strategy 2019-2023
Health Inequalities Strategic Plan 2022-2027 (Coventry & Warwickshire Health & Care Partnership)
Coventry Cultural Strategy 2017-2027
Coventry Housing & Homelessness Strategy 2019-2024 (2019) focuses on 4 key areas: Preventing & Supporting Homeless Households; Support for People & Communities; Improving the Use of Existing Homes; and Housing Development
West Midlands Combined Authority Strategic Economic Plan is focusing on digital innovation; building a net-zero economy and creating thousands of green manufacturing jobs; building better digital and transport links
Coventry & Warwickshire Strategic Reset Framework Local Enterprise Partnership (CWLEP) aims to reset the economy following the impacts of Covid-19
Economic Growth & Prosperity Strategy for Coventry 2018-2022
West Midlands Combined Authority has set a priority for the region to become net zero by 2041, and Coventry Council is working on a **revised Climate Change Strategy** 2022-2030 setting out how Coventry will remain within its carbon budget
Warwickshire Local Transport Plan 2011-2026 and **Coventry Transport Strategy** (2022/23-2036/37)
Coventry City Council Local Air Quality Plan (LAQP, 2020-2024) is focused on transport and behaviour change around travel

Warwickshire County Council Minerals Plan (2018)
Severn Trent Water Resource Management Plan (2019) (& draft 2024)
Warwickshire Wildlife Trust Strategy 2030
Warwickshire, Coventry & Solihull Green Infrastructure (GI) Strategy

Summary Baseline Conditions

3.3 **Communities, Health & Wellbeing**: The total population of Coventry City Council was 345,300 (ONS 2021) an 8.9% growth from 2011 to 2021, and this is higher than the rate of 6.2% in the West Midlands. The population has growth particularly amongst younger adults, particularly aged 20-24. In 2020/21 academic years there were 67,255 students in Coventry universities. As with the population of England & Wales, census data confirm that there are more people in older age groups. The population of Coventry is predicted to increase to 422,919 by the year 2031 and to 454,534 by the year 2042.

3.4 The Index of Multiple Deprivation data (2019) for Coventry City indicate a range of deprivation (from least to most deprived) throughout the wards with the most deprived tending to be found in the city centre and radiating out towards the north/north-east, to the south-east and with a grouping of wards located near the boundary to the south-west. For the period 2015-2018, the Health Index for Coventry was 97.8, less than 100 average for England.

3.5 There is a need to plan for a growing, changing and increasingly diverse population that will need increasing participation and involvement to help maintain social cohesion and reduce risks for radicalisation and social exclusion. As communities grow and change, the provision of, and access to community and social facilities and services, needs to be maintained and improved for social and health wellbeing. As life expectancy is below average and health outcomes are worse in the more deprived areas of Coventry, a targeted approach has been identified. There is also a shift to focus on to prevention that will need a community-informed and culturally competent approach. Further work is needed at the local level through the place-based profiles to understand the city's avoidable outcomes, particularly around issues such as alcohol use and obesity/physical activity.

3.6 **Housing:** Housing delivery in the latest monitored period (AMR 2021/22) indicates that the cumulative delivery of 16,182 dwellings is 25% above the requirement of 12,900 at this stage of the Local Plan trajectory. This can be largely attributed to the recent growth of Purpose Built Student Accommodation (PBSA), reflecting Coventry's rising reputation as a leading university city that attracts students from around the world. The delivery of affordable housing was below the annualised need.

3.7 New demographic projections have been modelled (HEDNA, November 2022) and subsequently confirmed (HEDNA Addendum, 2024 to estimate the amount and type of housing that will be needed over the period to 2041 and 2050. The analysis indicates that the need for social or affordable rented properties should be focused on smaller properties. The older person population is projected to increase notably in the future and an ageing

population means that the number of people with disabilities is likely to increase substantially.. Coventry's housing stock is typically small and old; a lot of houses are not to modern efficiency standards. In 2021, 20% of Coventry households live in low-income low energy efficiency households, compared to just 13% nationally. It is necessary to consider a range of market and affordable housing to suit different needs. Co-living, especially for the younger demographic, can provide accommodation for younger professionals and help with graduate retention in the city once they qualify and seek local jobs.

3.8 **Economy:** The strengths of the city's economy, where Coventry has a competitive advantage, include advanced manufacturing and engineering; energy and low carbon; connected autonomous vehicles; business, professional and financial services; and digital, creative, and gaming. Before the pandemic hit, the Coventry & Warwickshire economy had grown at a rate higher than other Local Economic Partnership areas at that time in the country. Since Covid-19, the issues for the retail sector, and town centre retail in particular, are well known. Many hospitality and other businesses depend on the success of major tourist attractions. Overall delivery of employment land remained comfortably above the cumulative requirement of 70.40 ha at this stage of the Local Plan trajectory.

3.9 **Climate Change:** Coventry was one of the first cities to produce a Climate Change Strategy in 2012 with a target to reduce carbon dioxide emissions by 27.5% by the year 2020. Coventry achieved this in 2014 – six years early. The Strategy is currently under review and will set targets to reflect the current urgency of the climate crisis that is recognised by the City Council. The overall aim of the Strategy is to achieve a dramatic reduction in carbon emissions. 47% of all UK CO_2 emissions are linked to the construction and operation of buildings – both housing and commercial.

3.10 **Transport & Air Quality:** A Coventry City-Wide AQMA was declared for nitrogen dioxide in 2009 and emissions from road transport are the principal source of NO_2. The main transport corridors to the north and north-east (linked to the M6) are most likely to exceed the NO_2 standard. Indoor air pollution is becoming an increasing proportion of the problem as improvements in outdoor air pollution occur.

3.11 **Natural Resources (Soil, Water, Minerals, Waste):** The vast majority of development completions (90%) in 2021/22 were on former brownfield or previously developed land, with just 10% built on greenfield sites. In the English part of the Severn River Basin District, the majority of water bodies have an objective of good ecological status. For many of the water bodies, there is low confidence of meeting their objective by 2027 and pollution from wastewater remains one of the main reasons. There are no active working collieries in the area. Sand and gravel are required for minerals planning. Around 92% of residual municipal solid waste from the Coventry area is incinerated within an Energy from Waste facility and this heats eight major buildings in the city centre.

3.12 **Nature & Biodiversity:** There are no internationally designated nature conservation sites (European Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), and Ramsar sites) located within 20 km of the Coventry city centre – with the exception of the somewhat isolated Ensor's Pool SAC approximately 7.4 km to the north of the local plan boundary. There are 16 Local Nature Reserves (LNRs), and 21 designated areas of ancient woodland. The Warwickshire, Coventry & Solihull Local Biodiversity Plan (LBAP) comprises 52 action plans for species and habitats, ranging from wetlands and woodlands to urban and rural settlements. The Coventry area contains, and is in close proximity to, a number of both designated and non-designated natural habitats and biodiversity. The overall ecological network is also important for biodiversity helping to support the condition of designated sites and also enabling species to migrate in response to climate change.

3.13 **Historic Environment:** Coventry has a range of unique historic assets that give the area its distinctive characters and cultural identity. Coventry has over 400 Listed Buildings of national importance, together with over 280 buildings selected by the Council for Local Listing. The city has 18 Conservation Areas, 20 Scheduled Monuments, 4 Registered Parks and Gardens, and thousands of other archaeological sites, historic structures and features recorded on the Coventry Historic Environment Record. The Coventry Historic Landscape study (2011) identified 45 historic landscape character areas throughout the administrative area of the City Council. Coventry has benefited from two Heritage Action Zones.

3.14 **Townscape & Landscape:** Coventry is located within the Arden National Character Area (NCA) as profiled by Natural England. The NCA comprises farmland and former wood-pasture lying to the south and east of Birmingham; the eastern part abuts and surrounds Coventry. The Coventry Historic Landscape study (2011) identified 45 historic landscape character areas throughout the administrative area of the City Council. The Ancient Arden is an area of ancient countryside that stretches from just south of Atherstone in the North, running to the west of Coventry to Balsall Common in the south, and is especially important as an area of ancient countryside. The Coventry Green Belt remains an important mechanism to prevent urban sprawl, prevent towns merging; safeguard countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration.

Key Issues & Opportunities for Sustainable Development

3.15 From the policy context and analysis of the baseline information, the following key sustainability issues and opportunities were identified for the Coventry Local Plan Review area:

Table 3.1: Key Sustainability Issues & Opportunities

Topic	Key Issue for Sustainable Development
Communities, Health & Wellbeing	▪ Increasing population, especially in older age groups ▪ Need to plan for a growing, changing and increasingly diverse population

	▪ As communities grow and change, the provision of, and access to community and social facilities and services, needs to be maintained and improved for social and health wellbeing ▪ Need to focus on prevention to improve health & reduce inequalities - will need a community-informed and culturally competent approach ▪ Further work needed at the local level through the place-based profiles, particularly around issues such as alcohol use and obesity/physical activity
Housing	▪ The need to maintain a mix of new homes continues into to the 2040s ▪ Housing for the increase in the ageing group that will require resilience and adaptability to enable independent living for a longer time, and then increased care & support ▪ Self-build and custom housebuilding, as well as Coliving, are growing elements of the housing market ▪ High number of young people – need affordable homes ▪ Significant student population predicted to increase; as more PBSA schemes become built, other housing will be released into wider housing market ▪ need to improve the quality of the existing housing stock remains, especially with regard to damp and poorly insulated homes ▪ Climate change commitments will require, amongst other things, retrofitting existing homes to ensure that they are up to modern insulation standards
Economy	▪ Dramatic changes, accelerated by Covid-19, are likely with the shift from retail to other uses and a change in character of the city and local centres ▪ Employment and education/training uses may be able to fill gaps, including with coworking spaces and/or encouraging start-ups ▪ Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people
Climate Change	▪ Planning for climate change adaption should be a part of every new development ▪ Significant shifts in energy efficiency will be needed for new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure ▪ Retrofitting existing buildings will be a very significant challenge ▪ Consideration of embodied carbon is an ongoing challenge for the construction industry ▪ Planning for climate change mitigation means building resilience, including reducing risks from overheating,

	flooding and the resultant detriment to wellbeing, the economy and the environment ▪ Increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK
Transport & Air Quality	▪ Improve the sustainability of the transport system, improve integration with walking and cycling routes and green infrastructure networks, and promote more active travel ▪ Reducing vehicle emissions will continue to improve air quality; Indoor air pollution is becoming an increasing proportion of the problem ▪ Transport policies need to both encourage sustainable modes and also to discourage car use– for example, through restricted parking, zero emission zones, and reallocation of some road space to sustainable movement options ▪ Improvements in renewable transport provision and restrictions on car use in the city centre will help the city achieve zero carbon objectives ▪ Improvements to walking and cycling infrastructure need to be inclusive, for all residents and visitors, and to link within a wider network that aims to connect with the Family Hub priority areas identified for poor health ▪ Improving sustainable transport networks and associated green infrastructure (GI) will also benefit nature and wellbeing for people ▪ Encouraging active travel will help at the local level towards improving some of the city's health issues such as those associated with obesity and physical activity
Natural Resources	▪ Continue to build on previously developed land where effectively located; minimise the use of water and minerals as natural resources; and the need to reduce waste and reuse/recycle ▪ The effective use of land could consider whether an uplift in minimum housing density requirements might be possible where sufficient infrastructure is in place ▪ This would require careful consideration of reduced car ownership/parking but would further promote the Council's objectives towards zero carbon ▪ The best agricultural land must be conserved and effects of climate change may affect food security
Nature & Biodiversity	▪ Need to consider the new requirements from the Environment Act including emerging metrics for calculating biodiversity net gain ▪ Unequal distribution, and access to, green infrastructure across the city can exacerbate health inequalities ▪ There are priority areas that would benefit particularly from greening ▪ Off-site areas for biodiversity net gain may be needed ▪ Climate change is likely to affect changes to habitats and species distribution

	▪ There may be opportunities to enhance blue infrastructure and update requirements taking into account recent legislation on nature and biodiversity
Historic Environment	▪ Development pressures may continue to have potential negative effects on historic assets and their setting, especially through cumulative effects ▪ It is important to understand heritage value and local design guidance can be informed by local communities ▪ Mitigation of, and adaptation to, the effects of climate change are a particular challenge for heritage assets and their setting
Townscape & Landscape	▪ Townscape is closely interwoven with the historic environment ▪ It is important to promote good sustainable urban design and this should reflect the special characteristics and needs of different parts of the city and countryside ▪ Green, blue and open spaces should be woven into the urban design ▪ Green Belt remains an important mechanism to prevent towns merging and safeguard countryside from encroachment

Likely Evolution of Area without the Local Plan

3.16 There are likely to be some changes in sustainability characteristics of the Coventry area even without the review of the Local Plan to 2041. For example, the increasing use of electric cars, revised Building Regulations, and at least 10% biodiversity net gain with new standards for green infrastructure will lead to reduced greenhouse gas (GHG) emissions, improvements in air quality, more energy-efficient homes, and some recovery for the loss of nature and biodiversity.

3.17 However, the ongoing impacts of Brexit, Covid-19 and the continuing challenging circumstances are likely to have negative effects on socioeconomic factors. The economic outlook for Coventry[19] remains challenging and uncertain, exacerbated by the rapid inflation in 2022 that threatens the city's recovery, with rapidly increasing energy prices and cost-of-living impacting on the finances of households and businesses. The predicted increase in population, with changing demographics, will challenge the ability of the Council and its partners to accommodate such changes for the quality of life of its citizens.

3.18 Without the Local Plan, there would be no local guidance on housing such that the particular needs of tenure and mix in the right places are unlikely to be met. This could exacerbate existing problems, particularly for affordability, overcrowding and quality, with concomitant negative effects for health and wellbeing. There is a risk that communities would become unbalanced with

[19] https://www.coventry.gov.uk/facts-coventry/coventry-72

issues for the capacities of services and facilities in some areas, and perhaps challenging those areas that are already deprived. It is less likely that objectives for social inclusivity and vibrant communities would be achieved. Active living would be less encouraged. It is possible that neighbourhoods could become less safe and crime reduction would not be enabled in the absence of spatial planning.

3.19 Buildings contribute a significant proportion of GHG emissions and without the Plan, there would less progression towards aims for addressing the climate change crisis. Whilst national policy would still guide mitigation measures such as flood risk management and building regulations for building resilience to climate change, without the Plan there would be no cohesion or strategic coordination such that mitigation may not be optimised and opportunities may not be realised.

3.20 Increasing demands from development on green spaces and nature/biodiversity and natural resources, especially air, soil and water, will continue to have negative effects on the urban environment and people's quality of life. Without the Plan, there will be less effective use of land and this will affect other factors such as biodiversity and food security. There are priority areas that would benefit particularly from greening. The sustainable management of water is increasingly an issue with demands from new development and the needs of nature/biodiversity. Without the Plan, there is likely to be less integration of the different uses and needs of the water environment when considering new development.

3.21 Overall, mitigation measures of new development would not be coordinated to best avoid or reduce the adverse effects from development, including cumulative effects. Opportunities from new development, such as improving accessibility to green space and enhancing townscape quality/character, would not be realised or optimised – including contributing towards reducing health inequities.

4.0 SA OF STRATEGIC OPTIONS FOR THE COVENTRY LOCAL PLAN REVIEW 2021-2041

Identifying & Refining the Strategic Options: Initial SA at Regulation 18 consultation

4.1 During the progression of initial technical studies and early development of issues and options for plan-making, certain strategic options were identified that should be tested through the SA process, as follows:

4.2 **Strategic Options for Quantum of Housing Needs**: Coventry Council, together with local authority Partners across Coventry & Warwickshire published a new Housing & Economic Needs Assessment (HEDNA, November 2022) that sets out the amount and type of housing and employment growth that will need to be planned for up to the year 2041. The Housing Topic Paper[20] sets out the potential housing scenarios and explains how these were identified.

- Scenario 1 is the Government's Standard Method calculation. This uses the 2014 Population Projections which have been shown to be erroneous for Coventry. This method indicates a total minimum need of 63,760 new homes over the plan period.
- Scenario 2 is the amount identified through the HEDNA. This uses the more accurate 2021 Census data rather than the erroneous 2014. figures. It indicates a need of 39,280 new homes over the plan period.
- Scenario 3 is the HEDNA figure but with the 35% uplift removed (Government has applied this uplift to England's largest cities). It indicates a need of 29,100 new homes over the plan period.

Table 4.1a: Options for Quantum of Housing Needs 2022-2041	
1	63,760 dwellings (3,188 per annum) – Government standard method[21] (with ONS population projections from 2014)[22]
2	39,280 dwellings (1,964 per annum) – HEDNA method[23] (with census population data from 2021)
3	29,100 dwellings (1,455 per annum) – HEDNA method as per Option 2 but minus 35% uplift for largest urban authorities[24]

[20] Coventry City Council (May 2023) Housing Topic Paper

[21] https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments

[22] The ONS population data for Coventry has been found to be erroneous & overestimated. For example, please see: https://osr.statisticsauthority.gov.uk/correspondence/sir-andrew-watson-to-ed-humpherson-and-sir-david-norgrove-population-projections-and-mid-year-population-estimates-for-coventry/ and https://osr.statisticsauthority.gov.uk/wp-content/uploads/2021/05/Review-of-population-estimates-and-projections-produced-by-the-Office-for-National-Statistics.pdf

[23] Housing & Economic Development Needs Assessment (HEDNA, November 2022) https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna

[24] Government changes (rev December 2020) to the planning system include a 35% uplift to the housing number generated by the standard method for the 20 most populated cities & urban centres in England – and Coventry is on the list of 20 https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments

4.3 **Strategic Options for Residential Density:** It is important that the Council accommodates as much of its identified housing need as possible, including consideration of whether parts of the city can accommodate increased densification. In particular, there could be suitable possibilities for increasing densities to 200 dwellings per hectare (dph) at certain locations adjacent to, and outside of, the ring road. Therefore, the initial SA investigated through high level assessment two scenarios, as follows:

Table 4.1b: Options for Residential Density	
1	Greenfield 30 dph[25]; outside ring road minimum 35 dph; inside ring road minimum 200 dph. Current CLP Policy H9
2	As Option 1 but with >35 dph outside ring road – in certain locations

4.4 **Strategic Options for Progressing the Coventry Climate Change Strategy[26]**: At the time of preparing the initial SA, responses to the consultation draft were being analysed. The Climate Change Strategy 2023-2030 A Green Future for a Changing City was published in summer 2023. The Vision aims " *To make Coventry the UK's leading City for environmental change, improving the quality of life for all*." The Strategy recognises that "Achieving net zero will require changes that are unprecedented in their scale and scope, including changes to the way electricity is generated, how people travel, how land is used, and how buildings are heated.

4.5 The Strategy confirms the aims for a dramatic reduction of carbon emissions and sets out five development pathways to sustainability:

- Low emissions – new economic opportunities
- Circular economy – new models of production & consumption
- Equitable and people centred – inclusive urban communities & addressing poverty
- Nature-based – enhance biodiversity & urban ecosystems
- Resilient -anticipate, prevent, absorb, and recover from shocks

4.6 For the Local Plan Review, this means particular opportunities for energy efficiencies and renewables; enhancing biodiversity; high quality design that promotes active travel; accessibility to public transport and minimising need for private vehicles; reduce flood risk and heat gain, and addressing inequalities. At the early stages of the plan review, it was considered that there were possibilities for requiring standards for buildings and homes higher than is likely to be required nationally – in order to better support the ambitions of the Coventry Climate Change Strategy. Therefore, the initial SA investigated through high level assessment two scenarios, as follows:

[25] Dwellings per hectare

[26] Coventry Climate Change Strategy 2022-2030 https://www.coventry.gov.uk/draftclimatechangestrategy

Table 4.1c: Options for progressing Coventry's Climate Change[27] that aims for "*The dramatic reduction of carbon emissions to achieve carbon neutrality with a 100% reduction to 1990 levels by 2050 at the very latest*"	
1	Planning policy requirements in line with national Future Homes Standard[28] & Future Buildings Standard[29] covering energy efficiency, ventilation and overheating through Building Regulations
2	Planning policy requirements that are over and above proposed Building Regulations to better progress Coventry's aspirational ambitions for addressing climate change effects

4.7 **Strategic Options for Nature & Biodiversity:** There have been significant recent changes in requirements nationally that aim to ameliorate the critical losses of nature and biodiversity. It is considered that the Local Plan Review has strong opportunities to strengthen the importance of nature and biodiversity in the general wellbeing of a city to improve health and support climate change resilience. The details were set out in the Green Infrastructure & Biodiversity Topic Paper[30], and the initial SA investigated through high level assessment two scenarios, as follows:

Table 4.1d: Options for Nature & Biodiversity	
1	Planning policy requirements in line with national requirements & standards, including 10% Biodiversity Net Gain (BNG)[31], and Green Infrastructure (GI) standards[32]
2	Planning policy requirements that are over and above national requirements for BNG & GI standards

4.8 **Overall Approach:** The plan-making and SA teams worked in an iterative way to identify the meaningful strategic options for investigation. These initial strategic options were tested with high level appraisal through SA using the SA framework of objectives, the baseline information, and professional judgment. The high level assessment aimed to investigate the strategic options in a comparable and consistent manner. However, it should be noted that there is much uncertainty of significance of effects at the strategic level, including in the medium to longer term, and particularly with topics such as climate change. The SA made suggestions for the plan-making (to mitigate potential negative effects and to enhance potential opportunities) to consider to help inform decision-making as the preparation of the plan review develops further.

[27] Coventry's draft Climate Change Strategy 2023-2030
https://www.coventry.gov.uk/downloads/download/7434/coventry-s-draft-climate-change-strategy
[28] For example, please see: https://www.futurehomes.org.uk/delivery-at-scale
[29] https://www.gov.uk/government/consultations/the-future-buildings-standard
[30] Coventry City Council (May 2023) Green Infrastructure & Biodiversity Topic Paper
[31] Environment Act 2021, and for example, please see https://consult.defra.gov.uk/defra-net-gain-consultation-team/consultation-on-biodiversity-net-gain-regulations/
[32] https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx

Consultation Representations to the Initial SA Report (May 2023)at Regulation 18

4.9 The Regulation 18 consultation on the CLPR Issues & Options[33] was undertaken from 18 July 2023 to 29 September 2023. There were limited representations at this Issues & Options stage for the SA and these are detailed in Appendix IV of this SA Report. Historic England suggested that there should be uncertainty of effects on the historic environment for Options 2 and 3 regarding quantum and for the options for densities of development. This was agreed. Natural England commented that plan-making should be informed by SA/SEA and HRA. The SA incorporates SEA and includes suggestions for plan-making. An HRA Report has been prepared and summary findings incorporated into the SA/SEA.

4.10 A developer commented that the Council had not fully identified the housing needs of the City by an apparent willingness to forgo meeting the City's market and affordable housing needs and exacerbate the socio-economic consequences of the housing crisis in favour of protecting sites in the Green Belt that would otherwise be entirely appropriate for sustainable residential development. It was agreed that the potential for housing development in the Green Belt should be tested through the SA process, and compared with the strategic option for some potential development in the Green Belt.

Identifying & Refining the Strategic Options: Developing the Options for Regulation 19 Consultation

4.11 As technical studies evolved and taking into consideration the findings of the initial SA, the comments received during the public consultation in summer 2023, further evidence and changes in national requirements, certain strategic options were further developed iteratively and additional strategic options identified that should be tested through the SA process.

4.12 **Strategic Options for Quantum of Housing Needs**: The Council has carefully considered the relevant evidence, the comments from consultations, and the findings of the assessment studies for sites that had been potentially identified for development. The Housing & Economic Development Needs Assessment (HEDNA, Nov 2022)[34] studies informed the three options that were tested through SA and reported in the Initial SA Report (May 2023). The HEDNA Addendum (2024) has considered the implications of more recent data post the 2021 census and has concluded that the HEDNA figures remain robust. The Housing & Economic Land Availability Assessment (HELAA, 2024)[35] reports a site assessment and selection process that has identified the availability, suitability and achievability of potential sites for housing in the Coventry Local Plan area. It has enabled the calculations of housing and employment land

[33] https://www.coventry.gov.uk/planning-policy/local-plan-review/3
[34] Coventry City Council (Nov 2022) Housing & Economic Development Needs Assessment (HEDNA) & HEDNA Addendum (2024) https://www.coventry.gov.uk/planning-policy/local-plan-review/3
[35] Coventry City Council (2024) Housing & Economic Land Availability Assessment (HELAA) https://www.coventry.gov.uk/planning-policy/local-plan-review/3

for identifying the quanta that can be accommodated. A Density Paper (2024) has also been prepared to inform decision-making with regard to the densities of housing that would be suitable in specific areas.

4.13 From these studies, and taking into account the preferred approaches for other strategic options, including residential densities and development out of the Green Belt, the Council identified from supply figures that the quantum of housing development that can be accommodated on brownfield land is approximately 31,500 dwellings (around 1,575 per annum). This thus constitutes a further option that needs to be tested through the SA in a comparable manner.

4.14 As the SA studies were progressing, the new Labour Government published (30 July 2024) for consultation proposed reforms to the NPPF[36], including a revision to the standard method for calculating housing needs. Using the new proposed method, the Council has calculated that the housing needs for the Coventry area over the plan period would be 30,540 dwellings (1,527 per annum)[37]. Whilst the proposal is under consultation until 24 September 2024, it was decided to test such housing need through SA.

4.15 Good practice SA has established through examination and legal challenge that it is important for the strategic options to be assessed in a consistent and comparable manner. Therefore, the options that had been assessed in the initial SA have been refreshed and the additional options (No 4 & No 5) tested in the same way, as in the Table 4.1e, as follows:

Table 4.1e: Options for Quantum of Housing Needs 2022-2041	
1	63,760 dwellings (3,188 per annum) – Government standard method (with ONS population projections from 2014)
2	39,280 dwellings (1,964 per annum) – HEDNA method (with census population data from 2021)
3	29,100 dwellings (1,455 per annum) – HEDNA method as per Option 2 but minus 35% uplift for largest urban authorities
4	Approx. 31,500 dwellings (1,575 per annum) – HEDNA method as per Option 2 with housing numbers that can be accommodated based on supply figures
5	30,500 dwellings (1, 527 per annum) – calculated through proposed new standard method for assessing housing needs (July 2024)

4.16 **Strategic Options for Residential Density:** In their review of the Local Plan, the Council has subsumed the previous separate City Centre Area Action Plan (AAP) into the new plan. This includes the definition of the City Centre boundary as being the area previously defined within the AAP. This has enabled development of a further option (No 3) that identifies densification possibilities a city centre transition zone. Therefore, the SA of options 1 and 2

[36] https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system
[37] Iceni for Coventry City Council (July 2024) https://www.coventry.gov.uk/planning-policy/local-plan-review/3

has been refreshed and a further option 3 has been tested through SA in a consistent and comparable way, as in the Table 4.1f, as follows.

Table 4.1f: Options for Residential Density	
1	Greenfield 30 dph[38]; outside ring road minimum 35 dph; inside ring road minimum 200 dph. Current CLP Policy H9
2	As Option 1 but with >35 dph outside ring road – in certain locations
3	Greenfield 30 dph; Brownfield 45 dph; 125 dph in defined city centre transition zone; 250 dph in city centre

4.17 **Strategic Options for Progressing Coventry's Climate Change Strategy:** There were no refinements or further options identified; the SA findings from the Regulation 18 stage informed the ongoing plan-making.

4.18 **Strategic Options for Nature & Biodiversity:** There were no refinements or further options identified; the SA findings from the Regulation 18 stage informed the ongoing plan-making.

4.19 **Strategic Options for Development in the Green Belt**: There was some concern raised through the Regulation 18 consultation that the implications of including development sites in the Green Belt had not been investigated through the SA. Nationally, there has been renewed discussion recently around development in the Green Belt and the new Labour Government has confirmed its intention to introduce a new definition of grey belt land and development in the Green Belt with proposals in the revision of the NPPF.

4.20 Therefore, it was clear that the strategic options for the Council's approach should be tested through SA. The technical update[39] to the Green Belt Review identified that all the green belt land within the Council's area is of good quality that serves the five purposes of Green Belt. However, consideration of grey belt in the NPPF is only at the consultation stage and the CLPR is being submitted under the current NPPF which does not specify requirements concerning grey belt. Therefore, there are only two options that are necessary to be tested through SA, as in Table 4.1g, as follows:

Table 4.1g: Options for Development in the Green Belt	
1	Potential for development within the Green Belt
2	No potential development within the Green Belt

4.21 **Strategic Options for Employment Land:** The HEDNA (2024) studies identified the likely employment land needs and the HELAA (2024) reports the availability, suitability and achievability of potential sites for employment in the Coventry Local Plan area. The HEDNA concluded that 147.6 general industrial land was needed for the Coventry LP area to 2041. However, capacity studies (HELAA 2024) and the employment land review (ELR 2024) indicate that this quantum of land may not be possible within the constrained nature of the Coventry area.

[38] Dwellings per hectare
[39] Coventry City Council (August 2024) Green Belt Review Technical Update

4.22 It has been calculated that 60 hectares for general industrial development could be accommodated within the CLP area. It was further identified that an additional site (Site North of A45 & West of Brick Hill Lane - 11.81 hectares developable area) was being promoted. However, this is located in the Green Belt, and thus needs to be tested through SA. Therefore, three reasonable approaches to allocating such land and requiring testing through SA were determined, as follows:

Table 4.1h: Options for General Industrial Employment Land	
1	156.1 hectares – HEDNA (2022) – 8.5 ha office; 147.6 ha general industrial (excluding strategic B8)
2	As per HEDNA 147.6 ha general industrial but with office land reduced by 30% to 5.95 ha (hybrid working reduces floorspace needs)
3	60 ha plus an additional 11.81 ha located in the Green Belt (Site North of A45 & West of Brick Hill Lane)

4.23 For Coventry, the office land needs have been calculated to be 8.5 ha to 2041 (HEDNA 2022). The Employment Land Review (ELR, May 2024) further studied existing employment land and needs. A recent Office Market Study (June 2024)[40] focuses on the changes and trends in the office market since the HEDNA and ELR and to identify if the conclusions and recommendations are still valid. The Study raises issues for suitability and deliverability of existing allocations, potential over-supply, growing demands for flexible leases and workspaces, together with on-site parking, and continuing flexible and hybrid working patterns.

4.24 The ELR Office Market Study confirmed that the 2022 HEDNA included an oversupply for office space. It also confirmed that the density of space allowed for each full-time employee could be reduced to better reflect changes in working patterns and thus better allow future flexibility and hybrid working. Therefore, three reasonable alternatives were identified for testing through SA, as follows:

Table 4.1i: Options for Quantum of Office Development	
1	8.5 hectares offices (HEDNA), assume 85,000 sq m
2	5.8 hectares offices (HEDNA less 2.7 hectares oversupply as per the ELR office market addendum) assume 58,000 sq m
3	4.12 hectares offices (reduced land take for offices as per the ELR office market addendum based on allowance of 10sqm per full time employee instead of 14sqm assumed previously, to allow for increased flexible and hybrid working patterns. This broadly equates to the more high level 30% reduction assumed by the HEDNA) assume 41,200 sq m

4.25 The adopted CLP (2017) took a city centre approach to allocating land for office development. However, since the Covid-19 epidemic working patterns have changed and the findings of the ELR and Office Market Study confirm the need for more flexibility and adaptability. Taking into account the over-

[40] DLP Planning Ltd for Coventry City council (June 2024) Coventry Office Market Study: An Addendum to the Coventry Employment Land Review

supply and changing needs, the three strategic approaches to distributing land for office development were identified, as follows:

Table 4.1j: Options for Distribution of Office Development	
1	City Centre focus including Friargate
2	A more dispersed approach
3	City Centre focus to include 39,549 sqm floorspace at Friargate[41] and the rest distributed to other defined centres (overall, 41,000 sq m minimum)

4.26 The PBSA Market Study (2024) has identified the housing needs for students. It was recognised that a significant amount of the windfall delivery has been through the provision of Purpose Built Student Accommodation (PBSA). As such, the windfall expectation has been tempered to 200 dwellings pa to take account of the reduced expectation of further PBSA schemes to come forward. Therefore, it was determined that there were two strategic approaches to student accommodation and that these should be tested through SA, as in Table 4.1k, as follows:

Table 4.1k: Options for Purpose Built Student Accommodation (PBSA)	
1	Retain Policy H10 Student Accommodation as adopted Plan (2017)
2	PBSA to be located at campus/city university area unless evidence demonstrates otherwise on a case by case basis

SA Findings for Strategic Options

4.27 The detailed findings of the SA of the strategic options are presented in Appendix III of this SA Report. The following sections of this Chapter 4 present the findings of these SAs summarised by sustainability topic. The reasoning for why the Council has chosen to reject certain strategic options and progress other strategic options is then outlined (and as in accordance with the requirements of the SEA Regulations).

SA of Strategic Options: Quantum of Housing

4.28 The summary findings of the initial and updated high level SA of strategic options for the quantum of new housing development are presented in Table 4.2a, as follows:

[41] An office block was constructed in 2022 (12,449 sq m) leaving 27,100 sq m at Friargate & 1,451 sq m elsewhere

Table 4.2a: Strategic Options for Quantum of Housing Development **Sustainability Objective**	**1_Standard Method (2014) – 63,760 dwellings**	**2_Standard Method (2022) – 39,280 dwellings**	**3_Standard Method less 35% 29,100 dwellings**	**4. Can be Accommodated approx. 31,500 dwellings**	**5. Proposed Standard Method (2024) 30, 540 dwellings**
1: To enable vibrant and inclusive communities	+?	+?	+	+	+
2: To provide accessible essential services and facilities for all residents	+	+	++	++	++
3: To improve health & promote active living	+?	+?	+	+	+
4: To provide decent and affordable housing for all	+?	++?	++	++	++
5: To support sustainable inclusive economic growth	--?	-?	+?	+?	+?
6: To help achieve the Council's ambition to reach net zero carbon emissions	+?	+?	+	+	+
7: To build resilience to climate change	-?	-?	+	+	+
8: To reduce traffic & improve sustainable transport choices	--?	-?	0?	0?	0?
9: To reduce air, noise & light pollution	0?	0?	0?	0?	0?
10. To protect & conserve natural resources – soil, water, minerals & waste[42]	-	-?	0	0	0
11: To protect and enhance nature & biodiversity	--?	-?	+?	+?	+?
12: To protect and enhance the historic environment, and its setting	-?	-?	0?	0?	0?
13: To protect and enhance the quality and character of townscapes & landscapes	--?	-?	+?	+?	+?

[42] First cell refers to land/soil & water resources; second cell refers to minerals & waste

4.29 **Vibrant Communities**: There is a need to plan for a growing, changing, ageing and increasingly diverse population that will need increasing participation and involvement to help maintain social cohesion and reduce risks for radicalisation and social exclusion. The provision of new good quality homes will have positive effects for people, and higher numbers of new homes could have positive effects for more people. However, the higher quantum of new development is likely to overload the capacity of existing communities to absorb new people and some uncertainty of effects for Options 1 & 2.

4.30 Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies, rather than the overall quantum of housing. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical and mental disability, single parents, carers, travellers, but not explicitly ethnic or cultural housing needs. Overall, likely minor positive effects for all five options.

4.31 **Services & Facilities**: The location of new development is guided by specific policies – and these consider accessibility to physical, social and green infrastructure – including appropriate mitigation measures to ensure that services and facilities are sufficient. It is considered that the lower quantum of new housing in Options 3, 4 and 5 is less likely to overload the capacity of services and facilities – and has been found to be able to be accomodated (HELAA 2024)[43] - with less negative effects and therefore, overall more likely positive effects.

4.32 **Health & Active Living**: Coventry became a Marmot City[44] in 2013 and is committed to reducing inequality and improving health outcomes for all. Since 2019, the key focus is on children and young people, and following the impact of Covid19 on the city, also prioritising the effect on ethnic minority group communities. Healthy ageing is a challenge throughout England. Provision of good quality housing and access to employment is well established as contributing to better health and wellbeing – physical and mental – therefore, positive effects for all five options.

4.33 The effectiveness of reducing health inequalities is likely to be associated with the location of new development. In consideration of the land constraints in Coventry, the higher quanta of housing are likely to be difficult to accommodate - homes may need to be small, more densely located and thus less able to meet the variety and adaptability of needs. Such quanta would also place pressures on the capacities of the open/green spaces in the city – and thus, limit the health and wellbeing associated with such spaces. Therefore, some uncertainty of the significance of the positive effects for Options 1 and 2.

[43] Coventry Housing and Economic Land Availability Assessment (HELAA, 2024) https://www.coventry.gov.uk/planning-policy/local-plan-review/3

[44] https://www.coventry.gov.uk/marmot-monitoring-tool/coventry-marmot-city-story-far

4.34 **Housing for All**: It may be asserted that opportunities to provide decent and affordable housing for all is more likely with the higher quanta of housing in Options 1 and 2 – if such numbers of homes could be accommodated within the constraints of the city area. Homes may need to be small, more densely located and thus less able to meet the variety and adaptability of needs – therefore, some uncertainties for significance of positive effects. Options 3, 4 and 5 have been found to be able to be accommodated (HELAA 2024) and therefore, could deliver the identified need for housing and indicating major positive effects for housing objectives.

4.35 Whilst delivery has not been an issue for the Council, there must be some uncertainty about availability of suitable land in sustainable locations to accommodate the higher quanta of housing in Options 1 and 2, and to meet with other objectives, particularly for climate change and biodiversity. It remains important to address any imbalance in the distribution of particularly affordable/social housing, and the need to improve the quality of the existing housing stock.

4.36 **Economy:** Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. The HEDNA (2022) considered population, housing growth and the economy in tandem based on the 2021 census figures; the Addendum Report (2024) investigated post 2021 census data and confirmed the robustness of identified needs calculations. Options 3, 4 and 5 have been found to be able to be accommodated (HELAA, 2024), indicating minor positive effects for employment objectives through delivery of identified housing needs to support the economy.

4.37 The highest quanta in Options 1 and 2 could require re-allocation of some employment land and/or result in increased commuting for work, indicating likely negative effects. It remains uncertain how the effects of Covid-19 on changing patterns of working, such as home working, co-working and hybrid working, will affect requirements for employment land during the plan period. However, recent studies (Employment Land Review & Office Market Study June 2024) confirmed that there is a requirement for flexibility and adaptability to support sustainable economic growth.

4.38 **Climate Change – Carbon Emissions**: The Council recognises the climate crisis with its Strategy (2022-2030)[45] that aims to make Coventry the UK's leading City for environmental change. This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure. All new housing development will need to meet updated national policy requirements, indicating minor positive effects for all five options in the longer term - assuming that the zero carbon trajectory can be achieved. However, there is some uncertainty that the higher quanta of housing in Options 1 and 2 would be able to meet with the enhanced requirements to meet with net zero

[45] https://www.coventry.gov.uk/draftclimatechangestrategy

carbon – particularly in the shorter term. Viability and costs may also be an issue in the shorter term as the construction industry develops new methods.

4.39 **Climate Change – Resilience**: There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK. Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to wellbeing, the economy and the environment. All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change.

4.40 There is some uncertainty that the higher quanta of housing in Options 1 and 2 would be able to meet with the enhanced requirements to build resilience – suitable land and viability (and particularly in the shorter term until technology catches up with requirements). Overall, provision of green spaces and sustainable drainage are key elements to progress objectives for climate change. The higher quanta of housing is likely to place greater pressures on these resources with minor negative effects for Options 1 and 2, that will be cumulative in the longer term.

4.41 **Transport & Movement**: A key objective remains for the review of the CLP - to improve the sustainability of the transport system in Coventry, improving integration with walking and cycling routes and green infrastructure networks, and promoting more active travel. Due to the predicted increase in population, transport policies need to both encourage sustainable modes and also to discourage car use – for example, through restricted parking, zero emission zones, and reallocation of some road space to sustainable movement options. It is uncertain whether such approaches could mitigate sufficiently for the higher quantum of housing in Option 1, due to boundary constraints.

4.42 The quantum of housing in Option 2 indicates a reduction in potential negative effects on transport objectives but with uncertainty at this stage as significance will vary with locations. The lower quanta of housing in Options 3, 4 and 5 have been found to be able to be accommodated and are less likely to be associated with significant cumulative negative effects and therefore, negligible or neutral effects are indicated. There may be some positive effects – especially in the longer term as walking/cycling/GI networks become better linked and more extensive.

4.43 **Reduce Pollution:** In the UK, air pollution has been recently reported (2022) as being the largest environmental risk to public health. Reducing vehicle emissions will continue to improve air quality. Indoor air pollution is becoming an increasing proportion of the problem. Noise pollution is an acknowledged issue for human health and wellbeing – physical and mental - (see SA No 3 and also certain biodiversity see SA No 11), and particularly road traffic noise (see also SA No 8) remains a major problem. Light pollution disturbance can adversely affect health & wellbeing, including fatigue, insomnia, stress and anxiety (and also certain biodiversity – see SA No 11). Environmental management and mitigation for pollution is guided by specific policies that will be updated providing mitigation measures such that there will be no

significant negative effects and overall indicating likely neutral or negligible effects for all five options.

4.44 **Natural Resources:** The vast majority of development completions (90%) in 2021/22 were on former brownfield or previously developed land, with just 10% built on greenfield sites. The review of the CLP has sought to give priority for continuing to build on previously developed land (PDL) where effectively located. The HELAA (2024) has identified that Options 3, 4 and 5 could be accommodated on PDL and thus indicating neutral/negligible effects for soil resources. Climate change, particularly incidences of hotter, drier, summers may exacerbate water supply issues; wetter and more flooding may overload wastewater systems. The cumulative effects of the higher quanta of housing in Options 1 and 2 may incur minor negative effects but with some uncertainty at this stage. The recent Water Cycle Study Stage 1 (June 2024)[46] indicates that there is water capacity for the quanta in Options 3, 4 and 5 – with potential neutral effects.

4.45 It is assumed that policies on minerals and waste management will be updated to address any capacity issues such that neutral effects would be indicated. However, there may be some uncertainty associated with the higher quantum of housing in Option 1.

4.46 **Nature & Biodiversity:** It will be necessary to consider the new requirements from the Environment Act and including emerging metrics for calculating biodiversity net gain. Unequal distribution, and access to, green infrastructure (GI) across the city can exacerbate health inequalities. There are priority areas that would benefit particularly from greening. Off-site areas for biodiversity net gain may be needed. Increased recreational pressures and water quality impacts (such as road run-off) as a result of new development can put pressure on GI and biodiversity. Climate change is likely to affect changes to habitats and species distribution.

4.47 The higher quanta of housing in Options 1 and 2 will challenge mitigation possibilities for Coventry – even with new development being required to provide biodiversity net gain. Land constraints will limit availability for provision of such biodiversity mitigation measures – and therefore, negative effects are indicated. The HELAA studies (2024) have indicated that the quanta of development in Options 3, 4 and 5 could be accommodated and therefore, likely negligible effects. However, all development will have to meet with the national Biodiversity Net Gain requirements, indicating positive effects. Overall, some uncertainties of significance of effects as dependent upon locations, densities, and any possibilities for sufficient offsite measures.

4.48 **Historic Environment:** Coventry has a range of unique historic assets that give the area its distinctive characters and cultural identity. Development pressures may continue to have potential negative effects on historic assets and their setting, especially through cumulative effects. As the population changes, local communities may change with different understandings of heritage value and importance. Mitigation of, and adaptation to, the effects

[46] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

of climate change are a particular challenge for heritage assets and their setting.

4.49 CLP policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment with neutral effects for Options 3, 4, and 5 but some uncertainty as depends upon details and precise locations. However, the quantum of housing in Option 1 and 2 is likely to have cumulative effects overall that will be difficult to mitigate due to the constraints within the City – therefore, minor negative effects but with some uncertainty at this stage. The historic environment is closely interwoven with townscape and good design (SA No 13). It may also be noted that new development can resolve existing sustainability problems with the historic environment, for example, by removing extant unsightliness of the setting of an asset, improving accessibility, and enhancing the asset with its context and setting.

4.50 **Townscape & Landscape**: It is important to promote good sustainable urban design and this should reflect the special characteristics and needs of different parts of the city. Good design should focus on people within the spaces, how they move, interact and socialise, and should ensure feelings of safety and security. Green and open spaces should be woven into the urban design, and consideration given to opportunities to enhance the blue infrastructure assets for Coventry. The administrative boundary of Coventry is tightly defined with many parts of the existing urban area abutting the Green Belt. Climate change and population growth are exacerbating environmental issues in urban areas. It is vital that space for green and blue infrastructure is retained and enhanced, including improvements to linkages and networks that will further benefit people and nature.

4.51 Significant negative effects are likely for Options 1 and 2, and particularly for cumulative effects, as such high quanta of development are likely to compromise the possibilities for embedded and other mitigation measures in the design process. New development that is high quality, creative and proportional to the receiving townscape and local environment can have very positive effects, and also act as a catalyst for further enhancement of quality and human wellbeing to the built environment. Positive effects are likely for Options 3, 4 and 5 as it has been indicated by the HELAA studies (2024) that such housing numbers can be accommodated within the urban area but some uncertainty remains as depends upon details and location.

Reasons for Selection/Rejection of Options for Quantum of Housing

4.52 **Table 4.2b: Outline Reasons for Selection/Rejection of Options for Quantum of Housing**

Strategic Option		Outline Reasons for Selection/Rejection
1	63,760 dwellings (3,188 per annum)	▪ Homes would need to be small, more densely located & thus unable to meet variety & adaptability of needs ▪ Quantum could limit land for open/green space with negative effects for health & wellbeing

		▪ Quantum would compromise ability to meet with other objectives, especially for climate change & nature ▪ Pressure on infrastructure & other services
2	39, 280 dwellings (1,964 per annum)	▪ Homes would need to be small, more densely located & thus unable to meet variety & adaptability of needs ▪ Quantum could limit land for open/green space with negative effects for health & wellbeing ▪ Quantum would compromise ability to meet with other objectives, especially for climate change & nature ▪ Pressure on infrastructure & other services
3	29,100 dwellings (1,455 per annum)	▪ Quantum could be accommodated & aligns with the Local Need figure set out in the HEDNA (minus the 35% cities uplift), enables flexibility & provides a buffer **Preferred Option**
4	Approx. 31,500 dwellings (1,575 per annum)	▪ Quantum calculated as being able to be accommodated & aligns with the identified need (Option 3) but provides no or very limiting buffer
5	30,540 dwellings (1,527 per annum)	▪ Quantum could be accommodated but provides only a limited buffer

SA of Strategic Options: Residential Density

4.53 The summary findings of the initial and updated high level SA of strategic options for the density of residential development are presented in Table 4.3a, as follows:

Table 4.3a: Options for Residential Density **Sustainability Objective**	**1_Greenfield 30 dph; Outside ring road min 35 dph; Inside min 200 dph**	**2_As Option 1 but Outside ring road >35 dph in certain locations**	**3_Greenfield 35 dph; Brownfield 45 dph; 125 dph in Transition zone 125 dph; City Centre 250 dph**
1: To enable vibrant and inclusive communities	**0?**	**+**	**++**

2: To provide accessible essential services and facilities for all residents	0?	0?	+
3: To improve health & promote active living	0?	+?	+
4: To provide decent and affordable housing for all	+?	++	++
5: To support sustainable inclusive economic growth	0	0	0
6: To help achieve the Council's ambition to reach net zero carbon emissions	0	0	0
7: To build resilience to climate change	0	0	0
8: To reduce traffic & improve sustainable transport choices	0	0	+?
9: To reduced air, noise & light pollution	0	0	0
10: To protect & conserve natural resources – soil, water, minerals & waste[47]	- 0	++ ? 0	
11: To protect and enhance nature & biodiversity	-?	++?	++
12: To protect and enhance the historic environment, and its setting	0	0	0
13: To protect and enhance the quality and character of townscapes & landscapes	0?	+?	+

4.54 The current CLP approach set out in Policy H9 provides mitigation measures to avoid or minimise likely potential negative effects by defining standards for residential densities according to the characteristics and capacity of the different receiving environments within the Coventry area. The need to protect greenfield land from development pressures and recognise the more rural context is recognised with a lower density of 30 dph. The opportunities for effective use of previously developed land, particularly in a central urban context, is understood and policy allows for a minimum density of 200 dph inside the ring road, which defines a separation between inside and outside. A slightly higher density of 35 dph is permissible outside the ring road on non-greenfield land. Currently housing development does not need its own parking for that land inside the ring road.

4.55 The Council has investigated possibilities for increasing residential density towards the city centre in certain locations. The City Centre is to be defined as the area currently covered by the City Centre Area Action Plan. The

[47] First cell refers to land/soil & water resources; second cell refers to minerals & waste

Density study[48] has identified development opportunities in the vicinity of the city centre boundary, thus defining a city centre transition zone where 125 dph is appropriate. This study has also found that there could be intensification of density within the city centre boundary to 250 dph due to its urban character and the proximity of city centre services and facilities; densification possibilities are also indicated with regard to green and brownfield land.

4.56 **Vibrant Communities**: It is considered that there is evidence to support higher density residential developments, taking into account housing needs type and mix with local character and appropriate building forms such that there could be positive effects to enable vibrant and inclusive communities in certain locations outside the ring road. There could be synergistic and cumulative effects with other SA objectives, such as those for active travel (SA No 3), enabling provision of identified housing need (SA No 4), and promoting higher densities will better protect and conserve natural resources (SA No 10 soils). The extant density arrangements will not be able to accommodate the increased housing requirements on brownfield land. Major positive effects are indicated by Option 3 that comprises the identified densification possibilities in defined areas of the CLPR area.

4.57 **Services & Facilities**: The current approach to residential densities would not be able to accommodate the identified housing needs on brownfield land. The refinement of densities to more specifically acknowledge the character and ability to accommodate different types of development as set out in Option 3 makes best use of accessibility to services and facilities with positive effects.

4.58 **Health & Active Living**: Overcrowding, poor housing conditions, and affordability problems have increased in recent years, as well as health inequalities. CLP Policy HW1 Health Impact Assessments (HIAs) that requires major development to ensure that it has no adverse effects on health and wellbeing, and the Health SPD[49], will be updated and thus there will be no significant negative effects through the current approach to densities. Since the provision of good quality housing is known to have positive effects on health & wellbeing, then ensuring that needs can be met through appropriate increases in density in certain locations is likely to have positive effects. The density studies confirm that housing needs can be met through the approach in Option 3 with more certainty of positive effects.

4.59 **Housing for All**: The current approach to residential densities would not be able to accommodate all the identified housing needs but it would progress provision such that some positive effects are indicated for Option 1, with uncertainty of significance at this stage of assessment. If ensuring that needs, including suitable mix and tenure for all identified groups, can be met through appropriate increases in density in certain locations, there are likely to be major positive effects for Option 2. The density study confirms that housing

[48] Coventry City Council (August 2024) Housing Density Paper

[49] https://www.coventry.gov.uk/downloads/download/5408/health_impact_assessment_supplementary_planning_documents_spd

needs can be met through the approach in Option 3 with more certainty of positive effects.

4.60 **Economy:** Options for housing densities will not directly affect objectives for economic growth and therefore, neutral effects for SA No 5.

4.61 **Climate Change – Carbon Emissions & Resilience**: All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve dramatic reduction of carbon emissions. Therefore, neutral effects for SA No 6 and No 7.

4.62 **Transport & Movement**: The Coventry urban area is well connected with sustainable transport modes. Increasing housing densities in certain locations outside the ring road and where there is good accessibility and capacity to encourage sustainable and active travel will mitigate any potential negative effects. There may be possibilities to enhance sustainable travel through new development; proactive mechanisms to discourage car travel may be needed. The intensification of densities in the city centre and the transition zone could better discourage car travel and improve sustainable transport choices with positive effects, although some uncertainty as might depend on specific developments. No parking is needed in the city centre and a reduction of 50% of normal standards would be applied in the transition zone.

4.63 **Reduce Pollution**: Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan and these policies will be updated and improved in the review, including taking account of advances in building design and materials resources uses such that mitigation measures could be ensured to enable promotion of appropriately increased residential densities in certain locations. Therefore, likely negligible effects for all three options.

4.64 **Natural Resources**: Some uncertainty of effectiveness of policy mitigation measures to protect natural resources from the scale of development; therefore potential minor negative effects for Option 1. Consideration of higher density residential developments will have positive effects for more effective use of land, particularly in the Coventry area that is so constrained, with possibilities for major significance but uncertain. These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities and environment.

4.65 **Nature & Biodiversity**: The scale of new development needed is likely to have strong pressures on green infrastructure (GI) and biodiversity with likely significant negative effects, even with the new requirements for biodiversity net gain. Consideration of higher density residential developments will have positive effects for more effective use of land, particularly in the Coventry area that is so constrained and with such importance for protecting spaces for GI and biodiversity. There are possibilities for major significance but uncertain at this stage of assessment. These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities and environment.

4.66 **Historic Environment**: The adopted Plan includes policies to protect the historic environment and these policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment – regardless of residential densities with negligible effects for all three options.

4.67 **Townscape & Landscape**: It is important to promote good sustainable urban design and this should reflect the special characteristics and needs of different parts of the city. The approach to residential densities already recognises the different characteristics and different possibilities for accommodating changes through increased development. High quality and proportionate new development can enhance the townscape and local character. By focusing the housing needs in certain locations with appropriate densification, pressures may be taken from other places; with high quality design, positive effects could be indicated but with uncertainty. These positive effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities & environment.

4.68 The summary findings of the initial high level SA of strategic options for residential density presented in Table 4.3a, as follows:

Reasons for Selection/Rejection of Options for Residential Density

4.69 **Table 4.3b: Outline Reasons for Selection/Rejection of Options for Residential Density**

Strategic Option		Outline Reasons for Selection/Rejection
1	Greenfield 30 dph; outside ring road minimum 35 dph; inside ring road minimum 200 dph. Current adopted CLP Policy H9	▪ Identified quantum need could not be accommodated
2	As Option 1 but with >35 dph outside ring road – in certain locations	▪ Identified quantum need could not be accommodated
3	Greenfield 35 dph; Brownfield 45 dph; 125 dph in defined transition zone; 250 dph within City Centre boundary	▪ Identified quantum need could be accommodated **Preferred Option**

SA of Strategic Options: Climate Change – Building Regulations Standards

4.70 The summary findings of the initial high level SA of strategic options for building regulations standards are presented in Table 4.4a, as follows:

Table 4.4a: Options for Coventry's Climate Change Strategy – Building Regulations Standards **Sustainability Objective**	**1_In line with FHS & FBS**	**2_Over & above Building Regulations**
1: To enable vibrant and inclusive communities	0	0
2: To provide accessible essential services and facilities for all residents	0	0
3: To improve health & promote active living	0?	++?
SA No 4: To provide decent and affordable housing for all	0?	?
5: To support sustainable inclusive economic growth	0?	+?
6: To help achieve the Council's ambition to reach net zero carbon emissions	0?	++?
7: To build resilience to climate change	0?	+?
8: To reduce traffic & improve sustainable transport choices	0	0
9: To reduce air, noise & light pollution	0	0
10: To protect & conserve natural resources – soil, water, minerals & waste[50]	-? 0	0? +?
11: To protect and enhance nature & biodiversity	+?	++?
12: To protect and enhance the historic environment, and its setting	0	+?
13: To protect and enhance the quality and character of townscapes & landscapes	0	0?

4.71 **Vibrant Communities; Services & Facilities**: Other factors are more likely to have potential effects on objectives for inclusive communities and services/facilities than requirements in line or above Building Regulations. Therefore, likely negligible or neutral effects for SA numbers 1 and 2.

[50] First cell refers to land/soil & water resources; second cell refers to minerals & waste

4.72 **Health & Active Living**: An approach that progresses aspirations for adapting to climate change more promptly by requiring standards above national Building Regulations is likely to have positive effects for health and wellbeing by better reducing the risks to health. Climate change affects the social and environmental determinants of health - clean air, safe drinking water, sufficient food and secure shelter. Any consequence of climate change that can bring physical ill health can also have mental health implications and climate change can negatively impact on mental health, including depression and anxiety.

4.73 Aligning with Government requirements may be considered to have negligible but uncertain effects for health and wellbeing. However, by requiring standards over and above Building Regulations, aspirations for reducing carbon emissions will be achieved sooner and will better support the aspirations for Coventry City with regard to building resilience to climate change effects, including those for health. By making a clear proactive commitment, such action could influence both physical and mental health with potential major positive effects. As climate change effects are global, considerable uncertainties indicated.

4.74 **Housing:** There is a perceived concern from the construction industry in being able to meet national net zero carbon targets because of various issues – and most notably with the embedded carbon in materials. Therefore, there is a risk that requiring higher standards than national Building Regulations will pose greater challenges for new development design and building – and particularly construction – such that costs and viability for house building may be compromised with potential negative effects, especially in the shorter term. However, the development sector has embraced sustainability with the need to achieve net zero carbon and implementation of the circular economy with design for durability, reuse, remanufacturing, and recycling. With commitment and creativity in design, higher standards may be more readily achievable; however, the effects on the delivery of the required housing is uncertain and unknown at this stage.

4.75 **Economy**: It is unclear whether any requirement for higher standards through Building Regulations would have any significant effects on economic growth. It could be asserted that higher standards might equate to higher costs & thus limit growth. However, Government has advised that the transition to net zero carbon is the growth opportunity of the 21st century. Coventry has strong commitments for innovation, research and development in new technology such that higher standards could be a catalyst to promote progress in the green economy and support the city's aspirations. Some research has indicated that it is cheaper to reduce greenhouse gas emissions than it is to deal with climate change impacts - and thus, this would support progressing higher standards sooner with some positive effects indicated for the economy.

4.76 **Climate Change – Carbon Emissions & Resilience**: Implementation of planning policy requiring higher standards to reduce GHG emissions and contribute to building resilience sooner than national requirements will have positive effects towards helping the Council achieve its ambitions but with uncertainties.

4.77 **Transport & Movement; Reduce Pollution**: Changes to Building Regulations will not affect these SA objectives numbers 8 and 9 - therefore, neutral effects.

4.78 **Natural Resources**: Soil has been recognised as an essential national asset. Climate change, particularly incidences of hotter, drier, summers may exacerbate water supply issues; wetter weather and more flooding may overload wastewater systems. The cumulative effects of increased development on soil and water resources is uncertain, particularly in the shorter-medium term before the effects of net zero carbon actions are implemented and become effective. Therefore, uncertain negative effects for Option 1.

4.79 Planning policy requirements in Option 2 that are over and above national building regulations requirements are likely to reduce carbon emissions earlier, thus mitigating negative effects on soils and water sooner, and thus indicating at least neutral effects – but uncertainty of significance at this stage of assessment. It is assumed that policies for minerals and waste management will be updated to address any capacity issues such that at least neutral effects would be indicated for both options.

4.80 **Nature & Biodiversity**: Climate change can contribute to biodiversity loss and biodiversity loss can make climate change and its effects worse. Government has recently reiterated that we cannot mitigate and adapt to climate change without Nature-Based Solutions. It could be considered that meeting the proposed national standards for building regulations and reducing GHG emissions could approach negligible effects – but uncertainty as depends upon quantum of new development. Progressing more rigorous standards would reduce GHG emissions and sooner such that mitigation measures are earlier and more effective. Therefore, there could be some positive effects for nature and biodiversity. However, this is uncertain as it depends upon the quantum of new development and the extent of associated biodiversity gain. It is noted that all development will have to meet with national requirements for 10% BNG indicating some positive effects from all development, assuming it can be delivered.

4.81 **Historic Environment**: Relevant policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. It could be assumed that progressing more rigorous standards would reduce GHG emissions and sooner such that mitigation measures are earlier and more effective so that there could be less risk of negative effects on the historic environment. However, some uncertainty as it depends upon the extent of development and precise location.

4.82 **Townscape & Landscape**: Relevant policies will be updated in the CLP review, and therefore, likely negligible effects with regard to the proposed changes to Building Regulations. There may be challenges to design and construction, particularly in the shorter term, if requirements over and above such standards are proposed and thus with some uncertainty of significance.

Reasons for Selection/Rejection of Options for Climate Change & Building Regulations Standards

4.83 **Table 4.4b: Outline Reasons for Selection/Rejection of Options for Building Regulations Standards**

Strategic Option		Outline Reasons for Selection/Rejection
1	National Future Homes & Buildings Standards	▪ Viability and land values can support national standards ▪ Can help support investment and development in the city that would otherwise be located in areas outside the city ▪ Option will be progressed through mandatory requirements to meet national net zero ambitions
2	Over and above proposed Building Regulations	▪ Can help Coventry meet its local and national net zero ambitions **Preferred Option** if no adverse effects on viability and land values that might deter developers investing/building in the city

SA of Strategic Options: Nature & Biodiversity Standards

4.84 The summary findings of the initial high level SA of strategic options for Nature & Biodiversity standards are presented in Table 4.5a, as follows:

Table 4.5a: Options for Nature & Biodiversity – Standards for Biodiversity Net Gain (BNG) & Green infrastructure (GI) **Sustainability Objective**	**1_In line with national requirements & standards**	**2_Over & above national standards**
1: To enable vibrant and inclusive communities	**0**	**0**
2: To provide accessible essential services and facilities for all residents	**+**	**++**
3: To improve health & promote active living	**+**	**++**
4: To provide decent and affordable housing for all	**+?**	**+?**
5: To support sustainable inclusive economic growth	**0?**	**0?**

6: To help achieve the Council's ambition to reach net zero carbon emissions	+	++?
7: To build resilience to climate change	+	++?
8: To reduce traffic & improve sustainable transport choices	0	0
9: To reduce air, noise & light pollution	+	++?
10: To protect & conserve natural resources – soil, water, minerals & waste[51]	+ 0	++? 0
11: To protect and enhance nature & biodiversity	+	++?
12: To protect and enhance the historic environment, and its setting	0	0
13: To protect and enhance the quality and character of townscapes & landscapes	+	++?

4.85 **Vibrant Communities**: The provision and accessibility of GI can encourage safe social connectivity and help reduce social isolation. It could be considered that provision of GI in line with proposed national standards would meet with objectives and that higher standards would not necessarily significantly affect inclusivity. There are other factors, including for building design and locations, that are more likely to have effects on vibrant and inclusive neighbourhoods. Therefore, negligible effects for both options.

4.86 **Services & Facilities; Health & Active Living**: It is likely that implementation of the proposed national standards for GI will increase provision of, and accessibility to, green infrastructure – with positive effects, including for health and wellbeing. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision and accessibility of GI with further positive effects – that are likely to be synergistic and cumulative, particularly in the longer term. The visible greening of the urban areas could further encourage people towards more active living with positive effects for health and wellbeing.

4.87 **Housing**: Provision of, and accessibility to, enhanced GI will improve the overall quality of residential development, supporting positive effects from housing provision for all. It is vital that the appropriate mix and tenure of housing, suitable for different housing needs of different people and at different times of their lives, is planned according to identified needs. Nonetheless, it is important to retain sufficient space to accommodate GI and in locations where it may better support nature and people. It is unclear at this stage what quantum of housing could be accommodated together with aspirational GI for nature, people and climate change. This is a particular

[51] First cell refers to land/soil & water resources; second cell refers to minerals & waste

challenge for Coventry with its boundary and other constraints. It is difficult to predict the effects of increasing requirements for GI above national standards on housing as it depends upon quantum and location of development with uncertainties at this stage of assessment.

4.88 **Economy**: The economic valuation of urban natural capital demonstrates multiple social, environmental and economic benefits and the importance of urban green and blue spaces and blue-green infrastructure. Whilst improvements to GI will enhance the local environment for residents, workers and visitors, it is unclear how this will directly affect sustainable economic objectives and therefore, uncertainties.

4.89 **Climate Change – Carbon Emissions & Resilience**: The GI Standards aim to improve resilience to and mitigation of climate change, including increasing carbon capture, preventing flooding, and reducing temperatures during heatwaves - all with positive effects. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision and accessibility of GI with further positive effects for resilience – that are likely to be synergistic and cumulative, particularly in the longer term. The more extensive greening of the urban environment would visually demonstrate a strong commitment to GI and progressing towards a dramatic reduction of carbon emissions that may further engage people in helping to achieve the Council's ambition. Uncertainties for significance at this stage of assessment.

4.90 **Transport & Movement**: Improving the sustainable transport network for cycling and walking can be integrated with the GI network for mutual benefits for nature and people. It is not clear how differences in GI standards will directly affect sustainable transport objectives – likely negligible effects for both options.

4.91 **Reduce Pollution**: Good quality GI has an important role to play in improving air quality in urban areas, including reducing particulate matter – and thus improving health/wellbeing – with positive effects. GI can reduce noise pollution – trees can act as sound barriers as they can either absorb or deflect noise (or both) and vegetation, including green roofs and wall systems act as sound insulation. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision and accessibility of GI with further positive effects for reducing air and noise pollution – that are likely to be synergistic and cumulative, particularly in the longer term, but with some uncertainty at this stage.

4.92 **Natural Resources**: Provision of GI – both green and blue – will contribute to protecting & conserving the natural resources of soils and water with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection of such natural resources but there is uncertainty for the significance of the further positive effects. It is not clear how differences in GI standards will directly affect sustainability objectives for waste and minerals – likely negligible effects for both options.

4.93 **Nature & Biodiversity**: Provision of GI – both green and blue – will contribute to protecting and enhancing nature and biodiversity with positive effects. It

seems reasonable to assume that higher GI standards will achieve better protection and enhancement of nature and biodiversity but there is uncertainty for the significance of the further positive effects.

4.94 **Historic Environment:** It is not clear how differences in GI standards will directly affect sustainability objectives for the historic environment, although for example, improvements in air quality through greening will reduce polluting effects on historic buildings – likely negligible effects for both options.

4.95 **Townscape & Landscape**: Provision of GI – both green and blue – will contribute to protecting and enhancing the quality and character of townscapes and landscapes with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection and enhancement of townscapes and landscapes but there is uncertainty for the significance of the further positive effects.

Reasons for Selection/Rejection of Options for Nature & Biodiversity Standards

4.96 **Table 4.5b: Outline Reasons for Selection/Rejection of Options for Nature & Biodiversity Standards**

Strategic Option		Outline Reasons for Selection/Rejection
1	National BNG & GI standards	▪ Coventry City Council has been applying 10% BNG for some time, the principle is already well established and is being delivered in tandem with a range of other initiatives which is felt to work well, especially as a proposed updated biodiversity SPD will help to provide flexibility of choice depending upon the local context **Preferred Option**
2	Over and above national BNG & GI standards	▪ There is much other work ongoing across Coventry and beyond eg Local Nature Recovery Strategy and it is considered a flexible approach to this is needed to achieve the most effective impact rather than simply mandating an enhanced quantified approach

SA of Strategic Options: Development in the Green Belt

4.97 The summary findings of the high level SA of strategic options for development in the Green Belt are presented in Table 4.6a, as follows:

Table 4.6a: Options for Development in the Green Belt **Sustainability Objective**	**1_Development within the Green Belt**	**2_ No development in the Green Belt**
1: To enable vibrant and inclusive communities	-?	0
2: To provide accessible essential services and facilities for all residents	0	0
3: To improve health & promote active living	+?	++?
4: To provide decent and affordable housing for all	0	0
5: To support sustainable inclusive economic growth	+?	-?
6: To help achieve the Council's ambition to reach net zero carbon emissions	0	0
7: To build resilience to climate change	0	0
8: To reduce traffic & improve sustainable transport choices	0?	+?
9: To reduce air, noise & light pollution	0	0
10: To protect & conserve natural resources – soil, water, minerals & waste[52]	0 0	+ 0
11: To protect and enhance nature & biodiversity	+?	+?
12: To protect and enhance the historic environment, and its setting	0	+?
13: To protect and enhance the quality and character of townscapes & landscapes	--	++

[52] First cell refers to land/soil & water resources; second cell refers to minerals & waste

4.98 **Vibrant Communities**: Other factors are more likely to have potential effects on objectives for inclusive communities than locations in or out of the Green Belt with negligible effects for both options. However, urban sprawl and encroachment of the countryside can affect the vibrancy of communities and some uncertainty of effects for potential development in the Green Belt. There is also the risk of unintended consequences of producing isolated communities – depends on location.

4.99 **Services & Facilities; Health & Active Living**: Other factors are more likely to have potential effects on objectives for accessibility to essential services and facilities than locations in or out of the Green Belt (GB). Provision of good quality housing will have positive effects on health and wellbeing regardless of whether it is in or out of the Green Belt. Protecting the openness of GB land, including for nature and recreation, is likely to have major positive effects for health and wellbeing with Option 2, although some uncertainty of the precise significance at this stage of assessment. Urban sprawl and encroachment of the countryside can affect residents' wellbeing and such development can evoke strong feelings – positive effects reduced for Option 1 with potential for some uncertainty of significance as depends on locational specificity.

4.100 **Housing**: The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (NPPF). Coventry has two distinctive types of Green Belt – the open countryside of Ancient Arden to the west; and GB corridors of open land tracts that extend through the built-up area of the city, to and from the countryside beyond. Of greatest significance is the wider GB that encircles the city, helping prevent urban sprawl.

4.101 Existing LP Policy GB1 Green Belt & Local Green Space provides detailed explanation of the difficulties facing the Council, particularly with such a tight administrative boundary. For the adopted 2017 LP, the Council considered the Joint Green Belt Review[53], together with other evidence to explore Coventry's exceptional circumstances regarding development pressures and release of some suitable land from the GB. Thus, at that time, the Council investigated any opportunities for GB land that would not be urban sprawl, retaining openness by avoiding/minimising any negative effects & optimising the positive effects for development land.

4.102 Coventry City Council has produced a Technical Update (July 2024)[54] to the Green Belt Review which informed its adopted Local Plan to assess whether the context to any of the assessed parcels of land have changed since the Plan was adopted. This has confirmed that the limited remaining GB land in the Coventry area continues to serve GB purposes. LP Policies GB1 Green Belt and GB2 Safeguarded Land in the Green Belt will be updated for the CLPR. Capacity (HELAA 2024) studies have determined that approx. 31,500 new dwellings can be accommodated within the urban areas to meet identified need and without needing to consider potential residential locations in the Green Belt. Therefore, neutral effects for both options.

[53] Coventry & Warwickshire Joint Green Belt Review (2015)
[54] Coventry City Council (July 2024) Green Belt Technical Update Study

4.103 **Economy**: Supporting the right balance of employment growth is fundamental for the communities of Coventry and to ensure that jobs are accessible to local people. The Council has identified a shortfall of employment sites within its own administrative area, against its identified quantum of local need. A particular site in the Green Belt (Site North of A45 & West of Brick Hill Lane) is being promoted for employment purposes. Therefore, potential minor positive effects for limited employment land in the GB but with some uncertainty at this stage as impact significance and mitigation possibilities depend upon locational and development details. Minor negative effects for the economy if the Council cannot meet its employment land identified need through avoiding suitable land in the GB – some uncertainty of significance as depends on development type and jobs details.

4.104 **Climate Change – Carbon Emissions & Resilience**: The Council's Climate Change Strategy will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure. Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019. It has been reported that the construction industry needs to decarbonise more urgently and building design needs to progress principles in the circular economy. All development will have to reduce GHG emissions and build resilience to climate change in line with updated planning policy – regardless of whether in or out of the GB – therefore, neutral effects for both options.

4.105 **Transport & Movement**: Transport produced 24% of the UK's total emissions in 2020 and remains the largest emitting sector in the UK, with the majority of emissions from road vehicles. Development in the Green Belt might not reduce traffic, whilst development focused on PDL might improve sustainable transport choices and therefore, neutral effects for Option 1 and minor positive effects for Option 2 – but uncertainty at this stage, as depends upon proposals and locations.

4.106 **Reduce Pollution**: Development in or out of the Green Belt will not affect this SA objective and no direct effects likely – neutral/not applicable.

4.107 **Natural Resources**: The review of the CLP will continue to build on previously developed land (PDL) where effectively located and thus contribute towards protecting agricultural land – and Green Belt land – with positive effects for Option 2, including by encouraging "*the recycling of derelict and other urban land*" and thus, supporting one of the five purposes of GB land. The recent Water Cycle Study Stage 1 (June 2024)[55] indicates that there is water capacity for the preferred residential quantum and therefore, likely neutral effects with regard to GB land for both options. The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures – they will be updated and at least neutral effects indicated for both options.

[55] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

4.108 **Nature & Biodiversity**: The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain important objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature and biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These will be updated and should provide sufficient mitigation such that effects from new development will be at least neutral with regard to GB land for both options. All development will have to meet with the national requirements for BNG indicating positive effects.

4.109 **Historic Environment:** The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment – with neutral effects for GB land. However, avoiding development in the Green Belt supports one of the 5 purposes – "*to preserve the setting and special character of historic towns*" – therefore, potential positive effects for Option 2 and the historic environment; uncertainty of significance at this stage as depends upon location.

4.110 **Townscape & Landscape**: Green Belt serves five purposes (NPPF)[56]:

> *(a) to check the unrestricted sprawl of large built-up areas;*
> *(b) to prevent neighbouring towns merging into one another;*
> *(c) to assist in safeguarding the countryside from encroachment;*
> *(d) to preserve the setting and special character of historic towns; and*
> *(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land*.

4.111 It is for LPAs to define and maintain GB land in their local areas. Coventry has two distinctive types of Green Belt – the open countryside of Ancient Arden to the west and north west; and GB corridors of open land tracts that extend through the built-up area of the city, to and from the countryside beyond. Of greatest significance is the wider GB that encircles the city, helping prevent urban sprawl and coalescence.

4.112 The adopted Coventry LP was informed by a sub-regional GB study (2015), and since the CLP removed 16% of GB to accommodate identified development needs at that time, there is now limited GB land in the CLP area Technical Review of GB, 2024). Existing LP Policy GB1 Green Belt & Local Green Space provides detailed explanation of the difficulties facing the Council, particularly with such a tight administrative boundary.

4.113 Coventry City Council has undertaken a technical update[57] to the original GB Review using the same methods that had been undertaken previously. The study has concluded that any potential releases of land from the GB for built

[56] The new Labour Government has set out plans for delivering homes in the Green Belt and confirmed through recent proposals for reform of the NPPF (July 2024). However, the CLPR is being submitted under the extant NPPF that does not have any requirements regarding grey belt land.
[57] Coventry City Council (July 2024) Green Belt Technical Update Study

development will have visual or other impact, and that the GB areas continue to serve GB purposes. The study recommends the areas to remain as GB in their entirety; also in respect of safeguarded land in the GB with a note that further technical study is required regarding the extant allocations set out in the Warwick DC LP and the proposed Warwickshire JLP. LP Policies GB1 Green Belt and GB2 Safeguarded Land in the Green Belt will be updated for the CLPR.

4.114 Since there is strong updated evidence that the limited GB in the Coventry area continues to serve GB purposes, it is considered that any proposals for development in the GB could have major negative effects. Protecting the limited GB in the Coventry area is likely to have major positive effects for GB purposes and the SA objectives.

Reasons for Selection/Rejection of Options for Development in the Green Belt

4.115 **Table 4.6b: Outline Reasons for Selection/Rejection of Options for Development in the Green Belt**

Strategic Option		Outline Reasons for Selection/Rejection
1	Development in Green Belt	▪ Adverse effects on GB purposes ▪ Adverse effects on landscape ▪ Risk of isolated communities
2	No development in Green Belt	▪ Identified quantum need could be accommodated without GB land ▪ Retains openness & protects townscapes/landscapes **Preferred Option**

SA of Strategic Options: Quantum of Employment Land

4.116 The summary findings of the initial high level SA of strategic options for development in the Green Belt are presented in Table 4.7a, as follows:

Table 4.7a: Options for Quantum of General Industrial Employment Land **Sustainability Objective**	**1. 147.6 hectares**	**2. 60 hectares calculated that can be accommodated**	**3. 60 ha + 11.81 ha located in Green Belt**

1: To enable vibrant and inclusive communities	-?	+?	+
2: To provide accessible essential services and facilities for all residents	0	0	0
3: To improve health & promote active living	-?	+?	+
4: To provide decent and affordable housing for all	-?	0	0
5: To support sustainable inclusive economic growth	+?	++	++
6: To help achieve the Council's ambition to reach net zero carbon emissions	0	0	0
7: To build resilience to climate change	0	0	0
8: To reduce traffic & improve sustainable transport choices	0	0	0
9: To reduce air, noise & light pollution	0	0	0
10: To protect & conserve natural resources – soil, water, minerals & waste[58]	0? 0	+? 0	+? - 0
11: To protect and enhance nature & biodiversity	+?	+?	+?
12: To protect and enhance the historic environment, and its setting	0?	0?	0?
13: To protect and enhance the quality and character of townscapes & landscapes	-?	0	0 --

4.117 **Vibrant Communities**: Provision of the identified need of 147.6 ha general industrial employment land in Option 1 as indicated by the HEDNA (2022)[59] would suggest that the role of employment contributing to vibrant communities would be satisfied with positive effects. However, capacity studies (HELAA 2024)[60] and review studies (ELR 2024)[61] indicate that this quantum of land may not be possible within the constrained nature of the Coventry area and therefore, negative effects but uncertainty of significance. Uncertainty of positive effects is indicated with Option 2 that is less than identified need but has been found that can be accommodated.

[58] First cell refers to land/soil & water resources; second cell refers to minerals & waste

[59] Housing & Economic Development Needs Assessment (HEDNA, November 2022) Iceni Projects Ltd on behalf of Coventry & Warwickshire Local Authorities

[60] Coventry Housing and Economic Land Availability Assessment (HELAA, 2023) https://www.coventry.gov.uk/planning-policy/local-plan-review/3

[61] DLP Planning Ltd for Coventry City Council (May 2024) Coventry Employment Land Review

Option 3 includes one additional site that is in the Green Belt. If potential negative effects on GB purposes can be mitigated, then with this additional site the quantum approaches the identified need and can be accommodated with more certainty of positive effects.

4.118 **Services & Facilities:** Other factors are more likely to have potential effects on objectives for accessibility to essential services and facilities than the quantum of employment land – neutral effects for all three options.

4.119 **Health & Active Living**: The relationship between fair employment, good work and health has been recognised for many years. Whilst employment rates have increased nationally since 2010, there has been an increase in poor quality work, including part-time, insecure employment (Marmot Review 10 years on, 2020)[62]. Since 2010 there have been profound shifts in many aspects of the labour market and employment practices in England. Rates of unemployment have decreased but increases in employment have often been in low-paid, unskilled, self-employed, short-term or zero hours contract jobs –which have seen a steady growth. Rates of pay have not increased and, notably, more people in poverty are now in work than out of work. The rise of automation in the labour market also has implications for health inequalities. Unemployment and poor quality work are major drivers of inequalities in physical and mental health.

4.120 Provision of the identified need of 147.6 ha general industrial employment land in Option 1 would suggest that employment needs would be met with concomitant positive effects for health. However, capacity and review studies indicate that this quantum of land may not be possible within the constrained nature of the Coventry area and therefore, some negative effects but uncertainty of significance. Uncertainty of positive effects is indicated with Option 2 that is less than identified need but has been found that can be accommodated. Option 3 includes one additional site that is in the Green Belt. If potential negative effects on GB purposes can be mitigated, then with this additional site the quantum approaches the identified need and can be accommodated with more certainty of effects.

4.121 **Housing**: Provision of good quality new homes will support the ambitions for sustainable economic growth and neutral effects suggested for Options 2 & 3. Studies have indicated that Option 1 cannot be accommodated. There is a risk that continuing to progress this option could compromise the availability of certain land for residential/mixed-use development and other uses, and limit the opportunities for ensuring that general industrial land is located in the most sustainable locations.

4.122 **Economy**: Coventry has seen strong economic growth over the past few years and is recognised as a national centre for a number of growing business sectors. These have all resulted in the creation of high-quality jobs for in growth sectors. However, there are a number of challenges, Coventry's economic growth and prosperity lags behind the England average and the city has fewer people in work compared to both regional and national

[62] The Health Foundation (Feb 2020) Health Equity in England: The Marmot Review 10 Years On https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on

figures. It is notable that many of Coventry's private sectors businesses are small or micro-businesses and the Council has an important priority to support such SMEs.

4.123 With regard to employment land needs, the HEDNA (Nov 2022) concluded that whilst the demand for B8 land use (storage/warehousing) is strong, there is a need for separate allocations for B1c/B2 (general industrial) where land is delineated from sites going for B8 in order to support the manufacturing sector. However, capacity studies (HELAA 2024) and land review studies (ELR 2024) indicate that this quantum of land may not be possible within the constrained nature of the Coventry area and therefore, uncertainty of significance for positive effects for Option 1.

4.124 Some uncertainty of positive effects is indicated with Option 2 that is less than identified need but has been found that can be accommodated. Option 3 includes one additional site that is in the Green Belt. If potential negative effects on GB purposes can be mitigated, then with this additional site the quantum approaches the identified need and can be accommodated with more certainty of effects. The Council is also reassessing whether the existing employment allocations are still suitable and deliverable and align with the overall strategy.

4.125 **Climate Change – Carbon Emissions & Resilience**: All development will have to reduce GHG emissions and build resilience to climate change in line with updated planning policy – regardless of quantum – therefore, neutral effects for all options.

4.126 **Transport & Movement**: The Council will seek to select employment development land that best supports objectives for sustainable transport – and it is indicated that Options 2 and 3 could be accommodated; Option 1 cannot be accomodated. CLP Policies AC1 Accessible Transport Network and AC2-AC6 will be updated to better support sustainable movement and active travel. Therefore, neutral effects for all three options.

4.127 **Reduce Pollution**: No direct effects likely – neutral/not applicable – as all development will be required to meet with EM Policies.

4.128 **Natural Resources**: Many of the existing sites are on PDL indicating positive effects for conserving soil but Option 1 does not use land as effectively as Options 2 and 3 such that the positive/negative effects indicate overall neutral with some uncertainty of significance of effects. Option 3 has most effectively used land but includes the additional site by the A45 and this is located in Grade 3 agricultural land indicating negative effects for loss of such land and the important soil resource. Therefore, both positive and negative effects for Option 3. CLP Policies EM1-EM6 and EM8-9 will be updated and thus provide sufficient mitigation for all development.

4.129 **Nature & Biodiversity**: The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide further mitigation measures such

that there will be no major significant negative effects. The Council will continue to allocate employment development sites to PDL and new development can create opportunities for enhancing GI and biodiversity with potential positive effects but uncertainty as depends upon locational specificity. All development will need to meet with the national requirements for BNG, indicating positive effects. .

4.130 **Historic Environment:** The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide sufficient mitigation measures to avoid significant negative effects on the historic environment – but some uncertainty as depends upon locational specificity. Overall, likely neutral/negligible effects for all options.

4.131 **Townscape & Landscape**: The current CLP includes policies to protect townscapes/landscapes, especially Policy DE1 Ensuring High Quality Design, and these will be updated in the CLP review. This indicates that sufficient mitigation measures will be provided through plan policies and thus, likely effect at least neutral for Options 2 and 3. However, Option 3 includes the site by the A45 and located within the Green Belt. This area of the Green Belt makes a significant contribution to the GB purposes and any development on the western extremity of the built up area would be extremely sensitive – indicating major negative effects. Therefore, both positive and negative effects for Option 3. The less than efficient use of land indicated by the quantum in Option 1 suggests that opportunities for enhancing the quality of townscape/landscape would not be progressed such that potential negative effects – uncertain as depends on locational specificity.

Reasons for Selection/Rejection of Options for Quantum of General Industrial Employment Land

4.132 **Table 4.7b: Outline Reasons for Selection/Rejection of Options for Quantum of General Industrial Employment Land**

Strategic Option		Outline Reasons for Selection/Rejection
1	147.6 ha	▪ Rejected as this level of growth cannot be accommodated within Coventry's constrained boundaries
2	60 ha – can be accommodated	▪ This amount can be accommodated with discussions across the FEMA with neighbouring authorities being explored to deliver the remainder which is consistent with the approach in the adopted Local Plan ▪ Potential to address shortfall with partner authorities without resorting to Green Belt release **Preferred Option**

3	60 ha plus an additional 11.81 ha located in the Green Belt	▪ Rejected as option includes a site in the Green Belt

SA of Strategic Options: Quantum of Office Development

4.133 The summary findings of the initial high level SA of strategic options for quantum of office development are presented in Table 4.8a, as follows:

Table 4.8a: Options for Quantum of Office Development **Sustainability Objective**	**1. 8.5 ha**	**2. 5.8 ha**	**3. 4.12 ha**
1: To enable vibrant and inclusive communities	-?	0?	+
2: To provide accessible essential services and facilities for all residents	0	0	0
3: To improve health & promote active living	-?	0?	+
4: To provide decent and affordable housing for all	-?	-?	+
5: To support sustainable inclusive economic growth	+?	++	++
6: To help achieve the Council's ambition to reach net zero carbon emissions	0	0	0
7: To build resilience to climate change	0	0	0
8: To reduce traffic & improve sustainable transport choices	0	0	0
9: To reduce air, noise & light pollution	0	0	0
10: To protect & conserve natural resources – soil, water, minerals & waste[63]	0? 0	+? 0	+ 0
11: To protect and enhance nature & biodiversity	+?	+?	+?
12: To protect and enhance the historic environment, and its setting	0	0	0?

[63] First cell refers to land/soil & water resources; second cell refers to minerals & waste

13: To protect and enhance the quality and character of townscapes & landscapes	-?	0	0

4.134 **Vibrant Communities**: Other factors are more likely to have potential significant effects on objectives for inclusive communities than the quantum of land for office development. However, provision of sufficient land for office development will support the economy and a diversity of jobs will overall contribute to vibrant and inclusive communities.

4.135 Option 1 reflects an earlier office development need. Updated evidence indicates that this quantum would be an over-supply and thus, would restrict possibilities for repurposing surplus office development land with potential negative effects for less than efficient use of land – uncertainty as depends on precise locations.

4.136 Option 2 reflects the office development need updated to remove the oversupply. This indicates positive effects for the contribution that office land makes to vibrant communities but also some negative effects since use of land may not have been optimised – overall neutral effects. However, Option 3 reflects the updated office land needed and takes into account increased flexibility and hybrid working patterns – thus providing more certainty of significance of positive effects overall for communities

4.137 **Services & Facilities:** Other factors are more likely to have potential effects on objectives for accessibility to essential services and facilities than the quantum of office land – neutral/not applicable effects for all three options.

4.138 **Health & Active Living**: The relationship between fair employment, good work and health has been recognised for many years. Option 3 reflects the updated office land needed and takes into account increased flexibility and hybrid working patterns with positive effects for health & wellbeing. Options 1 and 2 reflect earlier evidence indicating a higher requirement for office development land than is needed. This would restrict possibilities for repurposing surplus office development land with potential negative effects for less than efficient use of land for Option 1; the lesser quantum in Option 2 suggests less negative effects and overall neutral – uncertainty for both as depends on precise locations.

4.139 **Housing**: The provision of good quality new homes will support the ambitions for sustainable economic growth. There is a risk that continuing to progress Options 1and 2 is not the most efficient use of land and could compromise the availability of certain land for residential/mixed-use development and other uses. The opportunities for ensuring that office development land is located in the most sustainable locations could also be limited as other sites away from the centres may need to be sought – therefore, some potential negative effects indicated but uncertainty at this stage as depends on locational specificity. Positive effects for Option 3 as the repurposing of some previously allocated office land can release housing in suitable and sustainable locations.

4.140 **Economy**: Option 1 reflects an earlier office development need. Updated evidence indicates that this quantum would be an over-supply and thus, would restrict possibilities for repurposing surplus office development land with potential negative effects for less than efficient use of land – uncertainty as depends on precise locations. Option 2 reflects the office development need updated to remove the oversupply, thus indicating potential positive effects for the contribution that office land makes to sustainable economic growth.

4.141 However, Option 3 reflects the updated office land needed and takes into account increased flexibility and hybrid working patterns – thus providing more certainty of significance of effects. It also enables further positive effects for other SA objectives, such as for housing, by reducing the landtake for offices and releasing some land for repurposing. The Office Market Study (June 2024) confirmed the recommendations from the ELR (May 2024) that there is a need to reconsider the suitability and deliverability of existing allocations without permission. CLP Policies will be updated to reflect the needs for more flexible office spaces, including adaptable internal arrangements and shared facilities – especially relevant to support the needs of start-up businesses and SMEs that are so important to Coventry.

4.142 **Climate Change – Carbon Emissions & Resilience**: The All development will have to reduce GHG emissions and build resilience to climate change in line with updated planning policy – regardless of quantum – therefore, neutral effects for all options.

4.143 **Transport & Movement**; **Reduce Pollution**: The Council will seek to select development that best support objectives for sustainable transport – therefore, neutral effects overall for all three options. All development will be required to meet with EM Policies to reduce pollution – neutral for all options.

4.144 **Natural Resources**: Many of the existing sites are on PDL indicating positive effects for conserving soil but Option 1 does not use land as effectively as Options 2 and 3 such that the positive/negative effects indicate overall neutral. Some uncertainty of effects for Options 1 and 2 whilst for Option 3 that has most effectively used land, positive effects are more certain.

4.145 **Nature & Biodiversity**: Overall, likely minor positive effects for all options as all development will need to comply with plan policies on nature and biodiversity and national requirements for BNG.

4.146 **Historic Environment:** Overall, likely neutral/negligible effects for all options as all development will need to comply with plan policies on the historic environment but some uncertainty at this stage as depends upon locational specificity.

4.147 **Townscape & Landscape**: The current CLP includes policies to protect townscapes/landscapes, especially Policy DE1 Ensuring High Quality Design, and these will be updated in the CLP review. This indicates that sufficient mitigation measures will be provided through plan policies and thus, likely effect at least neutral for Options 2 and 3. The less than efficient use of land

indicated by the quantum in Option 1 suggests that opportunities for enhancing the quality of townscape/landscape would not be progressed such that potential negative effects – uncertain as depends on locational specificity.

Reasons for Selection/Rejection of Options for Quantum of Office Development Land

4.148 **Table 4.8b: Outline Reasons for Selection/Rejection of Options for Quantum of Office Development Land**

Strategic Option		Outline Reasons for Selection/Rejection
1	8.5 ha	▪ Initial quantum proposed by the HEDNA has been superseded by the ELR Office Market addendum which demonstrates an oversupply
2	5.8 ha	▪ Reduced HEDNA figure to take account of the oversupply, but still does not reflect optimisation of land usage as new patterns of working (hybrid / flexible) now use few sqm per person (10sqm rather than previous 14sqm as shown in the ELR office market addendum
3	4.12 ha	▪ Most effective use of land, taking into account oversupply and reduced floorspace requirements of changed patterns of working **Preferred Option**

SA of Strategic Options: Distribution of Office Development

4.149 The summary findings of the initial high level SA of strategic options for distribution of office development are presented in Table 4.9a, as follows:

Table 4.9a: Options for Distribution of Office Development **Sustainability Objective**	**1. City Centre focus**	**2. More Dispersed Approach**	**3. City Centre focus (Friargate) & rest to local centres**
1: To enable vibrant and inclusive communities	+?	+?	+
2: To provide accessible essential services and facilities for all residents	0	0	0

3: To improve health & promote active living	+?		+?		+	
4: To provide decent and affordable housing for all	0		0		0	
5: To support sustainable inclusive economic growth	+?		+?		++	
6: To help achieve the Council's ambition to reach net zero carbon emissions	0		0		0	
7: To build resilience to climate change	0		0		0	
8: To reduce traffic & improve sustainable transport choices	0		-?		0	
9: To reduce air, noise & light pollution	0		0		0	
10: To protect & conserve natural resources – soil, water, minerals & waste[64]	0	0	0	0	0	0
11: To protect and enhance nature & biodiversity	+?		+?		+?	
12: To protect and enhance the historic environment, and its setting	0?		0?		0?	
13: To protect and enhance the quality and character of townscapes & landscapes	0		0		0	

4.150 **Vibrant Communities**: Other factors are likely to have more significant effects on objectives for inclusive communities; however, distribution of sufficient land for offices to support the economy and a diversity of jobs will overall contribute to vibrant and inclusive communities. Option 1 and Option 2 have some uncertainty of positive effects whilst Option 3 that incorporates both city centre and distribution to the identified centres indicates more certainty as more likely to address future type & locational needs for office working – and throughout the CLP area.

4.151 **Services & Facilities:** Other factors are more likely to have potential effects on objectives for accessibility to essential services and facilities than the quantum of employment land – neutral effects for all three options.

4.152 **Health & Active Living**: Option 1 and Option 2 have uncertainty of positive effects whilst Option 3 that incorporates both city centre and distribution to the identified centres indicates more certainty as more likely to address future type & locational needs for office working.

[64] First cell refers to land/soil & water resources; second cell refers to minerals & waste

4.153 **Housing**: The provision of good quality new homes will support the ambitions for sustainable economic growth. Neutral/not applicable effects for all three options.

4.154 **Economy**: Options 1 and 3 include opportunities for innovating with the multi-user development of Friargate, and better enabling the city to be cleaner and greener with GI and renewable energy since such developments are better able to incorporate enhanced levels of quality and energy efficiencies. Options 2 and 3 may better support smaller start-ups & SMEs for all through a dispersed approach but Option 2 does not necessarily align office land with strong accessibility to sustainable services/facilities and travel, such that some uncertainty of positive effects. Option 3 supports the needs for flexibility and adaptability, support for smaller start-ups and SMEs, and with both a city centre focus and dispersion to the local centres, provides office land throughout the CLP area and aligned with sustainable locations such that more positive effects are more certain.

4.155 **Climate Change – Carbon Emissions & Resilience**: All development will have to reduce GHG emissions and build resilience to climate change in line with updated planning policy – regardless of quantum – therefore, neutral effects for all options.

4.156 **Transport & Movement**: Options 1 and 3 comprise office land located in the city centre and local centres, thus confirming that workplaces will be allocated with sustainable travel; Option 2 dispersed throughout the CLP indicates the potential for some negative effects but uncertainty as depends on locational specificity.

4.157 **Reduce Pollution**; **Natural Resources; Nature & Biodiversity; Historic Environment; Townscape & Landscape:** All development will be required to meet with relevant updated Plan Policies indicating that any potential negative effects will be mitigated and overall, likely neutral effects for all three options; minor positive effects for biodiversity with some uncertainty of significance.

Reasons for Selection/Rejection of Options for Distribution of Office Development Land

4.158 **Table 4.9b: Outline Reasons for Selection/Rejection of Options for Distribution of Office Development Land**

Strategic Option		Outline Reasons for Selection/Rejection
1	City Centre focus	▪ Whilst the city centre is a sustainable and key location for offices, a range of other options should also be available to suit the needs of different sectors of the economy including SMEs and start ups
2	More Dispersed Approach	▪ Does not optimise updated opportunities for City Centre & Friargate ▪ Potential for accessing through less sustainable travel choice

3	City Centre including 27,000 sqm Friargate & rest to local centres	▪ Most effective use of land which supports a range of needs including smaller businesses **Preferred Option**

SA of Strategic Options: Purpose Built Student Accommodation (PBSA)

4.159 The summary findings of the initial high level SA of strategic options for distribution of office development are presented in Table 4.10a, as follows:

Table 4.10a: Options for Purpose Built Student Accommodation (PBSA) **Sustainability Objective**	**1. Retain existing Policy H10**	**2. PBSA at campus, city university area**
1: To enable vibrant and inclusive communities	-?	0
2: To provide accessible essential services and facilities for all residents	0	0
3: To improve health & promote active living	+?	+
4: To provide decent and affordable housing for all	-	+
5: To support sustainable inclusive economic growth	0?	0
6: To help achieve the Council's ambition to reach net zero carbon emissions	0	0
7: To build resilience to climate change	0	0
8: To reduce traffic & improve sustainable transport choices	0	+
9: To reduce air, noise & light pollution	0	0
10: To protect & conserve natural resources – soil, water, minerals & waste[65]	0 0	0 0

[65] First cell refers to land/soil & water resources; second cell refers to minerals & waste

11: To protect and enhance nature & biodiversity	+?	+?
12: To protect and enhance the historic environment, and its setting	0?	0
13: To protect and enhance the quality and character of townscapes & landscapes	0	0

4.160 **Vibrant Communities; Services & Facilities**: A concentration of student accommodation in a particular neighbourhood could result in an imbalance that might adversely affect the vibrancy and inclusivity of communities, such that some negative effects indicated for Option 1 and retaining the existing policy H10. Significant concentrations in particular streets and neighbourhoods have already had negative impacts on local communities. The Council has prepared an HMO DPD[66] and this addresses issues such as effects on communities and the housing stock.

4.161 **Health & Active Living; Housing**: The HELAA (2024) recognised that a significant amount of the windfall delivery has been through the provision of PBSA. The PBSA Study (July 2024)[67] indicates that poorer quality student accommodation has been delivered and that this poorer quality stock is concentrated in the city centre. The overdevelopment of PBSA has implications for wider strategy in terms of development site availability, potential underoccupation of PBSA developments, and future change of use for alternative occupation. Over the longer term, this could be potentially damaging to the attractiveness of Coventry as a student destination and would stifle innovation.

4.162 Retaining the existing Policy H10 could result in HMOs/PBSA not being used most effectively and with negative effects for housing objectives as could take up land that is needed for other essential housing needs – Option 1. By limiting PBSA to the campus and city university area, the student population is more focused and very easily accessible to learning and other services in the city centre – positive effects for Option 2.

4.163 **Economy**: Likely neutral effects but some uncertainty for Option 1 as poorer quality student accommodation may adversely affect choice of university and thus, support for economic growth objectives.

4.164 **Climate Change – Carbon Emissions & Resilience**: All development will have to reduce GHG emissions and build resilience to climate change in line with updated planning policy – regardless of quantum – therefore, neutral effects for both options.

4.165 **Transport & Movement**: By focusing PBSA in the campus/city university area, sustainable transport will be more certain with positive effects for Option 2; neutral effects for Option 1.

[66] https://www.coventry.gov.uk/planning-policy/homes-multiple-occupation-development-plan-document
[67] Cushman & Wakefield (July 2024) for Coventry CC Purpose Built Student Accommodation Market Study

4.166 **Reduce Pollution**; **Natural Resources; Nature & Biodiversity; Historic Environment; Townscape & Landscape:** All development will be required to meet with relevant updated Plan Policies indicating that any potential negative effects should be mitigated and overall, likely neutral effects for both options with some uncertainty for Option 1 and the historic and townscape objectives; minor positive effects for biodiversity with some uncertainty of significance for both options.

Reasons for Selection/Rejection of Options for PBSA

4.167 **Table 4.10b: Outline Reasons for Selection/Rejection of Options for PBSA**

Strategic Option		Outline Reasons for Selection/Rejection
1	Retain existing Policy H10	▪ Risks continuing with poorer quality accommodation ▪ Potential underoccupation of PBSA & limits future change of use for alternative occupation
2	PBSA located at campus, city university area	▪ Student population more focused in more sustainable locations ▪ More effective use of land for other essential housing needs **Preferred Option**

SA Findings & Plan-Making

4.168 The findings of the SA of the strategic options identified a number of suggestions and recommendations for plan-making to consider – particularly at the Regulation 18 Issues & Options stage. These were taken into account during the refinement and further development of the plan, together with emerging evidence and the comments from the Regulation 18 consultation.

5.0 SA FINDINGS FOR THE SITE OPTIONS & PROPOSED ALLOCATIONS

Context & Site Options

5.1 It should be remembered that the Coventry Local Plan to 2041 is a review of the adopted Local Plan (2017) which includes site options and allocations that were subject to SA, consultation and examination. This review of the Plan allows the Council to review, reassess and update the situation with regard to development needs, site options and proposed allocations. The particular characteristics of the Coventry Local Plan area must also be recognised – the administrative area is heavily built-up, comprising a city centre that is rich with cultural and historical assets, surrounded by an urban area which is then defined by the encircling Green Belt land that is so important to prevent urban sprawl and coalescence. These characteristics constrain the opportunities for new development.

5.2 The Coventry[68] Housing & Economic Land Availability Assessment (HELAA, 2024) identifies land which is suitable, available and achievable for housing and economic development over the Local Plan period. It includes consideration of sites submitted to the Council through various "Calls for Sites", the most recent ending 20 September 2024. The HELAA builds upon the recommendations in the Housing & Economic Development Needs Assessment (HEDNA, 2023). The Council considered a site to be available for development if they were in one of the categories, as follows: Under construction; with outline/detailed planning permission; with permission in principle; identified on the brownfield register; submitted through the Call for Sites. Subsequently, viability studies were undertaken in line with national guidance to confirm achievability within the plan period by using a range of typologies to reflect likely development over the plan period.

5.3 The HELAA and viability studies confirmed that 25 of the existing housing site allocations and 7 of the employment land site allocations had not been built out, are still suitable and achievable, and should be carried forward Into the CLP to 2041. Three of the existing allocations were found to be still suitable and achievable with some changes, and this included the Friargate Mixed Use Scheme in the City Centre. There were 12 new housing sites that were found to be suitable and achievable, and therefore, were taken forward as proposed site allocations in the CLPR.

5.4 The 25 plus 7 extant sites and the 12 comprise all the identified suitable and achievable site options for housing/mixed use. There were no other reasonable alternative site options that were identified and could be considered any further. Thus, all the site options that were found to be reasonable (suitable & achievable) have been taken forward as proposed site allocations in the CLPR. One employment site option was subject to SA.

[68] https://www.coventry.gov.uk/planning-policy/local-plan-review/3

SA of Proposed Site Allocations

Table 5.1: Summary of SA Findings for Proposed Site Allocations

Proposed Site Allocations	Capacity (no. of dwellings)	1. Communities	2. Services & Facilities	3. Health & Active Living	4. Housing	5. Economic Growth	6. Net Zero Carbon	7. Resilience to Climate Change	8. Sustainable Transport	9. Reduce Pollution	10. Natural Resources [69]		11. Nature & Biodiversity	12. Historic Environment	13. Townscapes & Landscapes
New Housing Allocations (proposed minimum density 250 dph)															
Central Police Station, Little Park Street	600	+	++	+	++	0	0	0	++	0	+	0	+?	0?	0?
New Union Street	170	+	++	+	++	0	0	0	++	0	+	0	+?	0?	+
Former Vintage House, St Nicholas Street/Leicester Row	100	+	++	+	++	0	0	0	++	0	+	0	+?	0?	+
Whitefriars Street Car Park	185	+	++	+	++	0	0	0	++	0	+	0	+?	0?	+
Paybody Building, Stoney Stanton Road	280	+	++	+	++	0	0	0	++	0	+	0	+?	0?	+
Dale Buildings, Tower Street	200	+	++	+	++	0	0	0	++	0	+	0	+?	0?	+
City Centre South	1,575	++?	++	+	++	++	0	0	++	0	+	0	+?	0?	++

[69] First cell refers to land/soil & water resources; second cell refers to minerals & waste

New Housing Allocations (proposed density at 45 dph)															
New Gate Court Business Park, Paradise Street	303	+	++	+	++	0	0	0	++	0	+	0	+?	0?	+
Allesley Hotel, Birmingham Road	48	+	+	+	++	0	0	0	+	0	+	0	+?	0?	+
Former Chace School, Willenhall	60	+	+	+	++	0	0	0	+	0	+	0	+?	0	+
Former School Site, New Century Park	93	+	+	+	++	0	0	0	+	0	+	0	+?	0	+
New Housing Allocations (proposed density at 125 dph)															
Land at Spon End	750	++?	+	+	++	0	0	0	+	0	+	0	+?	0?	++
Existing Allocations with Changes															
H2:3 Walsgrave Hill Farm	900	++?	+	+	++	0	0	0	+?	0	+	0	++?	0	+
H2:15 Sandy Lane	250	+	+	+	++	0	0	0	+	0	+	0	+?	0	+
JE2:1 Friargate Mixed Use Scheme, City Centre	1,350	++?	++	+	++	++	0	0	++	0	+	0	+?	0?	++
New Employment Site Option															
Land North of A45 at Pickford Green	4.72 hectares	+?	+?	+	0	++	0	0	+	0	-	0	+?	0	--

5.5 The summary findings from the SA of the proposed site allocations are presented in the previous Table 5.1, and the details of the assessments are provided in Appendix V of this SA Report. There were no significant negative effects identified for any of the proposed new and changed housing site allocations. Such sites have been assessed and carefully selected to avoid significant negative effects and to optimise potential positive effects. The proposed site allocations will be subject to other plan policies, including updating, such that the cumulative effects of the proposed development (as guided by allocations and policies) are assessed and reported later in this SA Report in Section 7.

5.6 The one new site option being promoted for employment land was tested through SA and found to have major negative effects for development in the Green Belt; also, found to have minor negative effects for loss of Grade 3 agricultural land and the soil resource. Therefore, this site option was not taken forward because of negative effects on soils, agricultural land, and major negative effects on Green Belt purposes. This is especially with regard to avoiding urban sprawl and coalescence at the western edge of the urban area that has been shown to be very sensitive.

Vibrant & Healthy Communities

1: To enable vibrant and inclusive communities
2: To provide accessible essential services and facilities for all residents
3: To improve health & promote active living
4: To provide decent and affordable housing for all
5: To support sustainable inclusive economic growth

5.7 The provision and delivery of the identified needs for housing through the proposed site allocations will have major positive effects for housing objectives. Policies in the adopted Local Plan (Policies H1-H11) address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix and tenure of housing, with particular regard to affordable homes, for younger people and the potential for coliving. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups - poor, ageing, physical and mental disability, single parents, carers, and travellers. The Affordable Housing SPD (March 2022)[70] provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built. This SPD will be updated to reflect the new Local Plan.

5.8 Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by the specific housing policies. The extant policies do not explicitly mention ethnic or cultural housing needs but it is unclear how the Local Plan can help

[70] https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd

specifically in this respect. Nonetheless, the intention with the review of housing policies is to provide a range of housing types aimed at meeting a variety of needs for all sections of the community. The Density Study (August 2024)[71] has found possibilities for densification of residential development in and around the vicinity of the city centre boundary. Taking into account local character and appropriate building forms, a city centre transition zone with 125 dph has been identified. Within the city centre boundary, densification to 250 dph is possible due to its urban character and the proximity of a wide range of city centre services and facilities. Within the urban area and on brownfield land, an increase from 35 to 45 dph has been found to be suitable.

5.9 High density places have been associated with sustainable outcomes but there is a risk of less interaction and building fewer relationships in such environments. However, for example, recent research[72] has investigated the delivery of award winning high density (250 dph) development in London and identified design factors that influence social interactions. Therefore, it is considered that there is evidence to support higher density residential developments, such that there can be positive effects to enable vibrant and inclusive communities for all the proposed site allocations.

5.10 The proposed sites in the city centre locations have easy, walking access to a wide range of services, including schools, nurseries, shops, community and faith centres, shops, diverse cultural and entertainment facilities. Also, a range of health centres, dentists, fitness centres and gyms, together with access to open/green spaces – all supportive of active living, health and wellbeing with positive effects.

5.11 Whilst provision of new homes is not directly attributable to economic growth, good quality homes in a city centre location will support working people. The amended Friargate Mixed Use Scheme offers vital employment land in the city centre that has major positive effects for both Coventry and the wider sub-regional area.

5.12 The four new allocations at 45 dph close to the urban areas have been carefully selected at existing local centres with essential services and facilities and proposed housing numbers that can be accommodated – all confirming positive effects for vibrant communities. The three existing allocations (H2:3, H2:15 & JE2:1) that have been amended to reflect updating and optimising opportunities for revised proposed numbers of dwellings – all with positive effects for housing, health and communities.

5.13 **SA Suggestions**:

- Creative building design to support inclusivity and social interactions – especially for the larger developments City Centre South & Friargate Mixed Use Scheme

[71] https://www.coventry.gov.uk/planning-policy/local-plan-review/3

[72] Mellan H & M Short (UCL, 30 January 2023) Designing for social interaction in high density housing; a multiple case analysis of recently completed design-led developments in London https://www.frontiersin.org/articles/10.3389/frsc.2022.1043701/full

- Creative design to encourage flexible and adaptable housing to support mix and tenure with changing needs - especially for the larger developments City Centre South & Friargate Mixed Use Scheme

Sustainable Transport & Active Living

8: To reduce traffic & improve sustainable transport choices

5.14 The urban environment for Coventry is well connected and with a good transport system. The proposed sites in the city centre locations have easy, walking access to a wide range of services, facilities, work and entertainment – all with major positive effects for sustainable transport objectives. There is nearby open/green space with city parks, the Coventry Canal Towpath for more distance walking, and a variety of walking around the urban areas, for example, A Coventry Way: 21 Circular Walks.[73] The four new allocations at 45 dph close to the urban areas have been carefully selected at existing local centres with essential services and facilities and good sustainable access into the city centre and various nearby green/open spaces.

5.15 The major mixed use site Friargate is in the city centre with major positive effects for working and sustainable transport. The new option for a possible employment site is in a good location on the strategic highway network A45 at Pickford and close to local services at Pickford and Allesley.

5.16 **SA Suggestions**:

- Walsgrave Hill Farm - Incorporate a safe walking/cycling network through the new development and linking to urban area to west and country area to east to encourage more active transport and active living locally
- City Centre South and Friargate Mixed Use Scheme – creative design that encourages safe walking/cycling, linking to wider sustainable and green networks, and discourages private car ownership; consider possibilities for supporting shared vehicle uses

Environmental Quality

6: To help achieve the Council's ambition to reach net zero carbon emissions
7: To build resilience to climate change
9: To reduce air, noise & light pollution
10: To protect & conserve natural resources – soil, water, minerals & waste
11: To protect and enhance nature & biodiversity
12: To protect and enhance the historic environment, and its setting
13: To protect and enhance the quality and character of townscapes & landscapes

[73] https://www.coventryrocks.co.uk/things-to-do/a-coventry-way-21-circular-walks

5.17 All new development will need to meet updated plan policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions, build resilience to climate change, and avoid any significant negative effects. Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects for all the sites.

5.18 Development on previously developed land has positive effects for all proposed sites. The new option for a possible employment site is located in agricultural land classed Grade 3 good quality – and therefore, minor negative effects for this site through loss of best & most versatile land and the important soils resource. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)[74] indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development to neutral. Thus, mitigation measures are in place to protect and conserve natural resources.

5.19 The current adopted Plan has policies to protect nature and biodiversity, including GB1 Green Belt and Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements[75] for Biodiversity Net Gain (BNG) – and Coventry has established practice through such an approach with its BNG SPD (2022)[76]. Therefore, positive effects but uncertainty of precise significance as this depends on detailed project design.

5.20 The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation and Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. Many of the proposed sites are within the Three Spires View Cone area of the Tall Buildings Design Guide SPD (2022)[77], some are within archaeological constraint areas, and some are within or partly within Conservation Areas. These sites will be subject to the requirements of other plan polices and the SPDS such that negative effects should be mitigated to neutral/negligible but some uncertainty at this stage as this depends on design and project level studies.

[74] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC
[75] https://www.gov.uk/guidance/biodiversity-net-gain
[76] https://www.coventry.gov.uk/downloads/file/39624/biodiversity-net-gain-spd
[77] https://www.coventry.gov.uk/downloads/download/7391/tall-buildings-design-guide-and-view-management-framework-spd

5.21 The proposed site allocations are mostly in the city centre or within the urban areas such that if they are designed in accordance with the plan polices HE1, HE2, DE1 and GE1 (and to be updated), there should be effective mitigation measures in place to reduce any negative effects to neutral. Further positive effects are indicated through redevelopment of urban spaces, some vacant and some poor quality. Major positive effects on the townscape objectives were found for the major development proposals at City Centre South and the Friargate Mixed Use Scheme, as such regeneration of the city centre core will significantly improve the quality and character of the townscape with the potential to inspire wider enhancements beyond the sites themselves. Major positive effects for the site at Spon End as this is the regeneration of an area with dwellings not considered fit for habitation (currently vacant).

5.22 One new possible employment site Land North of A45 at Pickford Green has been put forward for consideration and was tested through SA - this is located within the Green Belt (GB) and thus, indicating negative effects. Green Belt is important to prevent urban sprawl and coalescence and the recent Technical Update (July 2024) by the Council confirmed that the GB parcels of land around Coventry continue to serve the five purposes of GB as set out in the NPPF[78].

5.23 The site is located in Area 1 of the Green Belt – it is the largest area and considered to make a significant contribution to the GB purposes. It forms part of the wider Meriden Gap and Coundon wedge, and any built development on the western extremity of the built-up area would be extremely sensitive. Further development in this area would therefore have the effect of substantially reducing its open character leading to the appearance of urban sprawl and very significant encroachment of the open countryside in this strategically important area of Green Belt between Coventry and Birmingham. Therefore, likely major negative effects for landscape and Green Belt objectives. This site is also located on Grade 3 good quality agricultural land and thus, negative effects for loss of such land and the soil resource. This site option was not taken forward into the Proposed Submission CLPR due to negative effects on landscape and Green Belt objectives.

[78] https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land

6 SA FINDINGS FOR THE DRAFT COVENTRY LOCAL PLAN: Regulation 19

The Vision & Objectives for the Local Plan

6.1 The One Coventry Plan (2022-2030)[79] sets out the following Vision:

'*One Coventry – working together to improve our city and the lives of those who live, work and study here.*

We will create:

- *A city with a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow, and new local jobs are created*
- *A city where our residents get the best possible start in life, experience good health and age well, in a city that embraces diversity, protects the most vulnerable and values its residents and communities*
- *A city that leads the way and invests in the green industrial revolution. Ensuring the future well-being of our residents by embedding environmentally friendly behaviours and exploring opportunities to lessen the pressures caused by climate change'*

6.2 The Vision includes three interconnected priorities:

- *Increasing the economic prosperity of the city and region*
- *Improving outcomes and tackling inequalities within our communities*
- *Tackling the causes and consequences of climate change*

6.3 The Local Plan has taken the key objectives from the One Coventry Plan list of commitments for each priority, where applicable to the planning system, and lists the planning policies that can help deliver the vision and priorities. Plan policies can be cross-cutting and, for example, Green & Blue Infrastructure Policies GE1-4 can contribute to all three priority objectives. In general, the Vision and the key objectives are likely to have positive effects for SA objectives, since they are aspirational and seek to address the future sustainable development of the Coventry area; there are no significant incompatibility issues between the two sets of objectives.

Overall Development Needs

6.4 **Policy DS1: Overall Development Needs** sets out that over the Plan period 2021-2041 significant levels of housing and employment will be planned for and provided along with supporting infrastructure and environmental

[79] https://www.coventry.gov.uk/onecoventryplan

enhancements – a minimum of 29,100 additional homes and a minimum of 60 hectares of employment land within the city's administrative boundary. The identified need for employment land is 147 hectares but it is not possible to deliver all the additional employment land within the city boundary. The Council will continue to work proactively with neighbouring Councils through Duty to Cooperate to ensure that appropriate provision is made elsewhere within the Housing Market Area. Retail need for the plan period is considered to be met by existing provision and therefore, no new retail floorspace is allocated.

6.5 **Policy DS2: Duty to Cooperate & Partnership Working** and **Policy DS3: Sustainable Development** - both these polices are still relevant and have only had minor updating.
Policy DS4: General Masterplan Principles – considered to be up to date and remains fit for purpose, particularly as this has been used to inform the development of key allocations some of which are underway at the time of the review.

6.6 These four strategic policies provide the overall approach to development needs. Policy DS1 reflects the review of development needs with the updating of predicted population change and associated needs for housing and employment land. The Council has investigated strategic options and selected a preferred approach for the quantum of development. This has been assessed as being able to be accommodated together with some buffer over the plan period. Therefore, overall, no significant negative effects indicated and major positive effects indicated for SA objectives for housing and economic growth, with further positive effects indicated for SA objectives for health and communities. Policy DS4 sets out key requirements relating to land use, densities, community facilities, transport, green/open spaces, phasing, local character, historic environment, energy and environmental management. Thus, this provides an overarching context for strategic mitigation measures to avoid or minimise potential negative effects from major new development.

6.7 **Policy HW1: Health & Health Impact Assessment (HIA)** – updating and broadening of scope to provide guidance for where the threshold has not been met for requiring a full HIA, for major applications of 10 dwellings or more, applicants will be required to demonstrate that they have taken health matters into account in line with the principles in the updated Health SPD. This broadening of the scope will extend the significance of the positive effects associated with provision of new development, including cumulative effects.

Jobs & Economy

6.8 **Policies JE1 – JE8 Economy & Employment**: - Strategic Policies **JE1: Economy & Employment Strategy** and **JE2: provision of Employment Land & Premises** have been updated to reflect national changes and to align with the One Coventry Plan, including the need to support sustainable and green technology – with additional positive effects that could support SA objectives for net zero carbon and resilience to climate change. The Council reviewed the existing site allocations for employment and found that seven

employment sites were still suitable and should be retained in the Local Plan Review. These had been previously tested through the SA process. One new site was proposed for employment and this option was tested through SA but the site has not been progressed further by the Council as it is located in the Green Belt and with concern about negative effects. Details about the sites and SAs are presented in Section 5 and Appendix V of this SA Report.

6.9 The updating of Policies JE3-JE7 and the separation of research & development into a new policy JE8 confirms the location, type and access to employment. Overall with major positive effects for SA objectives on economic growth, including for supporting local centres and providing access to a range of employment opportunities. Provision of employment land supports health and communities with further positive effects.

Housing

6.10 **Policies H1-H13 Housing** – significant updating to reflect changes in population and housing needs, and changes in national standards and legislation. The Council investigated strategic options and identified the preferred approach, as set out in Strategic Policy DS1, for a minimum of 29,100 additional dwellings between 2021 and 2041 that can be accommodated and as confirmed in **Strategic Policy H1: Housing Land Requirements**.

6.11 The Council reviewed the status of the existing site allocations (some built out, some being developed, some consented, some not started). It was identified that 25 housing and mixed use sites were still suitable and should be retained in the Local Plan Review to 2041. The Council assessed the site options that had been proposed through the calls for sites and found 12 new sites that were suitable and deliverable. All these sites were subject to SA and taken forward as proposed site allocations for housing and mixed use development in **Strategic Policy H2: Housing Allocations**. Details about the sites and SAs are presented in Section 5 and Appendix V of this SA Report. Overall, major positive effects for SA objectives for housing.

6.12 **Policy H3: Provision of New Housing** has significant updating to require all new dwellings to comply with Nationally Described Space Standards (NDSS), including increasing the supply of accessible and adaptable dwellings and wheelchair user dwellings with further positive effects for SA objectives for communities and health. The inclusion of policy wording for compliance with specific requirements for affordable housing, self/custom build and community led housing, build to rent, and co-living (set out in Policies H6, H12 & H13 will all have major positive effects for SA objectives for suitable mix and tenure, affordable, and ageing. The additional requirements regarding accessibility and sustainable/livable neighbourhoods indicate likely positive effects for SA objectives on services and facilities, and sustainable transport.

6.13 Requirements to avoid negative impacts on existing residential amenity and existing businesses provide mitigation measures. The additional policy text and cross-referencing to specific Environmental Management Policies provides further guidance and strengthens mitigation measures to help

ensure that there are no significant negative effects on SA objectives for environmental topics.

6.14 **Policy H4: Securing a Mix of Housing** has been updated to ensure that the required mix of housing that contributes to a balance of house types and sizes across the city is in accordance with the latest evidence, ensuring that positive effects will continue through the plan period.

6.15 **Policy H5: Managing Existing Housing Stock** has been updated in line with the Council's climate change strategy and as set out in the new Environmental Management Policies EM1, EM11, EM13 & EM14 – all with positive effects for SA objectives on net zero carbon and resilience to climate change.

6.16 **Policy H6: Affordable Housing, Policy H7: Gypsy & Traveller Accommodation, Policy H8: Specialist Housing, Older Persons Accommodation & Hostels, H10: Student Accommodation**, and **H11: Homes in Multiple Occupation** have been updated and strengthened. This confirms the major positive effects for SA objectives for affordable, younger people, travellers, and older people including adaptability and resilience. It will also confirm positive effects towards SA objectives for reducing health inequalities and having particular regard to potentially disadvantaged groups. The updating of Policy H10 focuses the student population at the universities and resolves an existing sustainability problem of poorer quality student housing in less sustainable locations. It also facilitates opportunities for release of housing for other people's needs in other parts of the city.

6.17 The Council has undertaken a Residential Density Study[80] in consideration of the constraints to new development by the tight boundary of the Coventry Local Plan area, and changing local circumstances. This has informed the updating of **Policy H9: Residential Density**. The study investigated the distinct local context, precedents of residential developments that have been delivered, and national examples of high quality developments at high densities. A range of character areas in the city were identified that reflect construction of homes in different time periods and planning contexts and establishing residential densities for each area. Higher densities for residential development with careful and creative design that enables social interactions can have strong sustainable outcomes including positive effects for sustainable transport, accessibility to services and facilities, communities, and health and wellbeing.

6.18 The study concluded that local character and context are more suitably reflected such that four densities were proposed – greenfield (30dph)[81], brownfield (45 dph), City Centre transition zone (125dph), and the defined City Centre boundary (250 dph). This makes more effective use of available land and helps enable that the identified needs for new housing can be accommodated within the urban areas of the Coventry administrative area, all with positive effects.

[80] Coventry City Council (2024) Residential Density Study
[81] Dph dwellings per hectare

6.19 **Policy H12: Build to Rent** and **Policy H13: Co-living** – two new policies that reflect changing needs. Build to rent developments will be expected to contribute towards meeting the city's identified need for affordable housing with positive effects. Co-living proposals will be supported in sustainable locations and of good quality and design – policy requirements provide mitigation measures to help ensure that there are no significant negative effects. The policy specifically requires that design should not contribute to car dependency with positive effects for SA objectives on sustainable travel. It also specifically requires adequate safety and security indicating positive effects for SA objectives on communities and health/wellbeing.

Retail & Centres

6.20 **Policy R1: Delivering Retail Growth, Policy R2: City Centre, Policy R3: Network of Centres, Policy R4: Out of Centre Proposals, Policy R5: Retail Frontages & Ground Floor Units**, and **Policy R6: Restaurants, Bars & Hot Food Takeaways** – these policies are mostly still relevant and up to date. Therefore, minor updating and reflecting changes in shopping patterns with a reduced need for retail locations. Positive effects remain for supporting SA objectives for communities, services & facilities, health/wellbeing, ands economic growth.

Communities

6.21 **Policy CO1: New or Improved Social Community & Leisure Premises, Policy CO2: Re-Use of or Redevelopment of Facilities**, and **Policy CO3: Neighbourhood & Community Planning** – no changes and minor updating for Policy CO2. These policies continue to protect community facilities and support community planning with positive effects for SA objectives on communities and services & facilities. Particular positive effects are indicated for supporting community participation and democratic decision-making through Policy CO3, and this is likely to have potential further positive effects on health and wellbeing.

Green Belt & Green Environment

6.22 Strategic Policy on the Green Belt and Local Green Space has been updated and split into two polices to better reflect that such land is covered by entirely different national policy. **Strategic Policy GB1: Green Belt** identifies the up to date boundaries for the Green Belt and retains that inappropriate development will not be permitted in the Coventry Green Belt unless very exceptional circumstances exist. The Council has prepared a Technical Update to the Green Belt Review (2024) and this has confirmed that all the Green Belt in the Coventry area still performs well against the five purposes of Green Belt.

6.23 The Council investigated strategic options and the preferred approach is for no development in the Green Belt as the Coventry area boundary is so constrained. Therefore, this policy continues to provide strong mitigation measures to avoid/minimise any negative effects for communities, health/wellbeing, previously developed land, biodiversity, the historic

environment, visual amenity and local character – all with positive effects for SA objectives. **Strategic Policy GB2: Safeguarded Land in the Green Belt** required only minor updating to align with the emerging South Warwickshire Local Plan – it was considered appropriate to retain the safeguarded status of the listed sites.

6.24 **Policy GB3: Local Green Space** – new policy separating text from previous GB1. The policy continues to provide strong mitigation measures to avoid and minimise any negative effects for communities, services/facilities, health/wellbeing, nature/biodiversity, and landscapes/townscapes – all with positive effects for SA objectives.

6.25 **Policy GE1: Green & Blue Infrastructure** has been updated, including the addition of "Blue", making explicit the requirement to consider the water environment and its wider multifunctionality, and the requirement to "enhance" as well as protect. Policy wording has been refined to provide more guidance and clarification, and including references to relevant Strategies and Plans. This updating and clarification will strengthen the mitigation provided by the policy. It will also strengthen the positive effects for communities, services/facilities, health/wellbeing, nature/biodiversity, and landscapes/townscapes, as well as contributing to SA objectives for sustainable water management and building resilience to climate change.

6.26 **Policy GE2: Green Space** has been updated and to ensure resilience in meeting local need for playing field provision – confirming positive effects, including for health and wellbeing.

6.27 **Policy GE3: Biodiversity, Geological, Landscape & Archaeological Conservation** has been updated essentially to reflect the new national requirements for new development to provide a minimum of 10% net gain in biodiversity. The requirement from the Environment Act (2021) for at least 10% Biodiversity Net Gain (BNG) from all new development became mandatory on 12 February 2024[82] (BNG is required for small sites from 2 April 2024). In accordance with national guidance, the policy requires development proposals to ensure that they lead to a minimum 10% net gain of biodiversity and provides further guidance on ecologic assessments. Requirements regarding on-site and off-site BNG and compensatory measures involving biodiversity offsetting including purchasing of biodiversity credits must be agreed in line with the Coventry Biodiversity Net Gain SPD (December 2022)[83]. This provides more detailed information and guidance, thus helping ensure that there will be implementation of the policy requirements – all with major positive effects for SA objectives on biodiversity.

6.28 The updated policy includes a requirement to seek opportunities for contributing to the delivery of the Local Nature Recovery Strategy and the Green & Blue Infrastructure Strategy and Action Plan or its future equivalent. This strengthens the policy and the positive effects for nature and biodiversity, and indicates further associated positive effects for health/wellbeing and building resilience to climate change – and these positive effects may be

[82] https://www.gov.uk/guidance/biodiversity-net-gain-what-local-planning-authorities-should-do
[83] https://www.coventry.gov.uk/downloads/download/7393/biodiversity-net-gain-spd

synergistic and cumulative in the longer term as they contribute to the wider networks.

6.29 **Habitats Regulations Assessment (HRA) Screening**: An HRA screening (August, 2024) was undertaken for the emerging draft CLPR and carried out in accordance with Government guidance[84]. The previous HRA (2015) had been carried out with extant guidance and methods applicable at that time. It was considered that the European/internationally designated sites[85] for nature conservation that needed to be scoped into the screening of the draft CLPR for Likely Significant Effects (LSEs) and any requirement for subsequent appropriate assessment (AA), were as follows:

- The Ensor's Pool SAC is located about 6km to the north of the CLPR area boundary
- The Severn Estuary SAC/SPA/Ramsar is located some 86km to the south west of the CLPR area boundary

6.30 The HRA screening considered the potential for LSEs on habitats' conservation objectives from: atmospheric pollution (nitrogen deposition); loss or damage to habitats and functionally linked land; disturbance from noise, vibration or light to sensitive species; and recreational pressures. The screening found that there were no impact pathways identified due to the distances from the CLPR area boundary. The screening also considered LSEs associated with changes to water quality and water quantity/levels/flow and there were no impact pathways identified. The draft Coventry & Warwickshire Sub-Regional Water Cycle Study (WCS) Stage 1 (June 2024)[86] indicates that there is the capacity for the proposed development in the CPLR. Therefore, this further confirms that the habitats sites are screened out for appropriate assessment with regard to water quality and quantity/flow/levels – in consideration of the capacities for proposed development and the distances of the proposed development from the habitats sites.

6.31 The HRA screening has found that there are no impact pathways and therefore, it is concluded that there are no adverse effects alone from the Coventry Local Plan Review on the integrity of the SAC, SPA and Ramsar sites that have been investigated as potentially relevant to the plan and its proposed development. In the absence of any adverse effects alone, there will be no adverse effects in combination with other plans and projects. This confirms the findings of the previous HRA and that there is no requirement for the Coventry Local Plan to include any policy regarding European/internationally designated sites for nature conservation.

6.32 **Policy GE4: Tree Protection** has been updated to provide additional clarification and a link to the Coventry Trees & Development Guidelines SPD

[84] https://www.gov.uk/guidance/appropriate-assessment
[85] Distances measured (direct nearest boundary to nearest boundary) using Magic Map (Defra) application https://magic.defra.gov.uk/magicmap.aspx
[86] JBA Consulting (June 2024) for Coventry CC, north Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford-on-Avon DC, and Warwick DC

(October 2020)[87]. This strengthening of the policy strengthens the mitigation measures with more certainty of avoidance of any potential negative effects for trees.

Design

6.33 **Policy DE1: Ensuring High Quality Design** – major revision requiring that all development proposals should follow a design-led approach to deliver sustainable high quality place-making. Development is required to contribute positively to the wellbeing of existing and new communities, and the quality of the surrounding built and natural environment. This all indicates positive effects for SA objectives on communities, health, reducing pollution, protecting natural resources, nature, and townscapes/landscapes. [The setting, integrity and character of heritage assets is already protected in accordance with Policy HE2.] All development must accord with Coventry's emerging City Wide Design Codes, demonstrating compliance with its key design principles. This provides further mitigation for any negative effects and strengthens the significance of positive effects.

6.34 New development is required to be planned and designed with reference to climate change mitigation and adaptation. This indicates further positive effects for SA objectives on net zero carbon and resilience to climate change. The policy also now includes reference to the Coventry Tall Buildings SPD, and specific reference to views of the city's three spires with regard to development in and around the city centre. A new policy clause (h) requires new development to consider that safety and security of new and existing users, indicating strengthening of mitigation measures and further positive effects for SA objectives on health and communities.

6.35 Additional requirements for car parking to be integrated, convenient and safe without detriment strengthens the policy and provides strengthened mitigation of any potential negative effects. Additional specific requirements for safe, secure, convenient and accessible cycle parking and storage and waste management facilities to be appropriately integrated within the overall development also provides strengthening of the policy with strong mitigation against any negative effects for amenity and health SA objectives.

6.36 **DE2: Delivering High Quality Places** – a new policy that includes specific requirements for public realm, public art, lighting, designing for healthy communities, and the City Centre and the City Centre Transition areas. This new policy retains elements from the City Centre AAP, notably with regard to public realm, public art, and lighting – and all with positive effects for communities and health/wellbeing across the CLP area. The requirement in designing for healthy communities to fully consider how physical and mental health and wellbeing for people of all abilities and ages has been considered and catered for provides strong mitigation for potential negative effects on SA objectives for inclusivity. The requirement to consider the local contexts within the City Centre and the City Centre Transition area strengthen the

87 https://www.coventry.gov.uk/downloads/download/5198/trees_and_development_guidance_draft_supplementary_planning_document_spd

mitigation measures against any potential negative effects; requirements to demonstrate how proposals contribute to the vision for the City Centre will strengthen the opportunities for enhancement with positive effects.

Heritage

6.37 **Policy HE1: Conservation Areas, Policy HE2: Conservation & Heritage Assets, Policy HE3: Heritage Park Charterhouse** – updating, including requirement in Policy HE2 to demonstrate how the relevant Historic England good practice guidance has been taken into account, and clarification regarding the consideration of exceptional cases, where harm cannot be outweighed by public benefit. **Policy HE4: Archaeology** – new policy created by extracting the relevant parts of the previous Policy HE2 for clarity and to provide some more detail. With such strengthening, these polices will continue to conserve the historic environment providing mitigation measures to avoid or limit potential negative effects.

Accessibility

6.38 **Policy AC1: Accessible Transport Network** – significant updating of this policy to reflect latest policy and guidance and the Council's emphasis on prioritising sustainable travel. Additional policy text requires sustainable transport modes to be fully integrated into the design and place-making. This requires an improvement in the proportion of trips made by walking, cycling and public transport, and a reduction in car dominance – all with positive effects for SA objectives on sustainable transport. The specific requirements for streets and the public realm for improvement in quality and resilience will have positive effects for health and wellbeing, together with the improvements for air quality, green and blue infrastructure – with further positive effects for SA objectives for communities, biodiversity and townscapes/landscapes. This requirement could include consideration of noise too. The Policy also allows for emerging and future intelligent mobility infrastructure.

6.39 **Policy AC2: Road Network** – updating, including requiring development to actively support intelligent mobility infrastructure and positively integrate with the sustainable transport network. Proposals should not negatively impact road safety, thus providing mitigation measures for SA objectives on health.

6.40 **Policy AC3: Demand Management** – updated and including a requirement for proposals to encourage and incentivise sustainable travel, such as through the provision of Mobility Credits – with further positive effects indicated for SA objectives on health and sustainable transport. Parking standards have been reviewed and updated with the details in Appendix 5 of the Local Plan seeking to reduce car dependency and make any parking need more relevant to local characteristics, development type and distance from the services and facilities of the City Centre.

6.41 CLP Appendix 5 recognises three distinct zones – City Centre, Transition Zone, Outer City – acknowledging the variances in car usage and accessibility across the city. Details and guidance are provided for cars, including electric

vehicles, goods vehicles, drop-off and loading areas, and for people with disabilities. Details and guidance are also provided with regard to cycle parking. The detailed guidance will help ensure implementation of policy requirements indicating more certainty of significance of effects. Overall, this will contribute towards a modal shift, further enhancing positive effects for health, resilience to climate change, and sustainable transport.

6.42 **Policy AC4: Active Transport Provision including Walking, Cycling & Micro Mobility** – updating includes new policy text for access to walking and cycling routes to be appropriate for all abilities and needs, including wheelchairs, indicating positive effects for SA objectives on accessibility and inclusivity. Further details are set out regrading cycling facilities, and the Council will promote walking and cycling by delivering a wide range of walking and cycling schemes – all with positive effects for SA objectives for communities, health and sustainable transport.

6.43 **Policy AC5: Bus, Demand Response Transit & Rapid Transit** – updating and to reflect the Council's emphasis on prioritising bus use and support for demand response transit – all promoting positive effects for SA objectives on health and sustainable transport. **Policy AC6: Rail** - updated to include support for electrification of rail lines and improved routes to the East Midlands. **Policy AC7: Freight** – updated requiring applicants to have more consideration of HGV movements and facilities on site, particularly regarding big warehouse and distribution centres – providing stronger mitigation measures to limit potential negative effects on health and amenity.

Environmental Management, Minerals & Waste

6.44 **Policy EM1: Planning for Climate Change Adaptation** – significant updating to strengthen the strategic approach, including addressing overheating in new buildings, achieving a water efficiency target of 100l/person/day, and considering making connections available to the Coventry Heat Network. All development must meet net zero (regulated operational carbon) for residential and non-domestic development, including embodied carbon and waste – all with major positive effects towards SA objectives for reaching net zero carbon emissions. All development must consider water neutrality in regard to improving resilience to climate change and enabling waterbodies to brought up to Good status – indicating positive effects for SA objectives for climate change and water resources (quantity and quality). Policies EM2-3 deleted and replaced by Policies EM11-EM14 (and please see later in this section).

6.45 **Policy EM4: Flood Risk Management** – updating to reflect changes in national legislation and policy. Additional policy text seeking to restore natural river form and remove culverting where possible with positive effects for SA objectives on green/blue infrastructure. Additional text concerning the safety of those sleeping in any ground floor accommodation in areas at risk of flooding provides stronger mitigation measures to reduce potential negative effects on health and wellbeing. **Policy EM5: Sustainable Drainage Systems SuDS** - updating with national legislation and policy. Separate guidance will detail how SuDS schemes will be designed, adopted and maintained in

accordance with technical standards – and this will support the implementation of the mitigation measures ensuring certainty of effects. **Policy EM6: Redevelopment of Previously Developed Land** – updating and in line with the Water Cycle Study (2024) for relevant standards on water efficiencies.

6.46 **Policy EM7: Air Quality** – minor updating to confirm that requirements should be in line with the Air Quality SPD. **Policy EM8: Waste Management**; **Policy EM9: Safeguarding Mineral Resources**; **Policy EM10: Non Mineral Development in Mineral Safeguarding Areas** – no changes to these policies and they continue to support SA objectives for protection of natural resources, waste and minerals.

6.47 **Policy EM11: Energy Infrastructure** and **Policy EM12: Net Zero (regulated operational carbon) New Build Non-Domestic** Development – new policies addressing operational carbon to ensure that buildings are fit for the future through the updated national Building Regulations and local requirements with major positive effects for SA objectives on net zero carbon and building resilience to climate change. Information is provided on energy metrics and guidance for no fossil fuels, on and off site renewable energy, offsetting, smart energy systems, and post occupancy evaluation – all supporting the implementation of the policies. The policies have considered the potential adverse effects on viability, land values and developers' investment and mitigation measures are provided with flexibility of application. These policies extend beyond national standards in Building Regulations that aim for net zero carbon in 2050 throughout the UK. Thus, these policies with their wider approach will better enable progress towards the Council's ambitions for net zero carbon locally in 2030 with positive effects sooner.

6.48 **Policy EM13: Overheating in New Buildings** – new policy recognising that meeting ambitious space heating demands in new buildings will be at increased risk of overheating due to the ability of the building to retain heat well. The policy provides mitigation measures to avoid potential negative effects on health and wellbeing. Such overheating mitigation measures align well with green and blue infrastructure policies since measures such as green roofs, walls and trees are effective for cooling/shading and improving nature and biodiversity.

6.49 **Policy EM14: Embodied Carbon & Waste** – new policy that addresses the shift in proportion from operational carbon to embodied carbon over a building's lifetime carbon emissions and ensures that embodied carbon is considered in working towards a wholly net zero carbon building. Positive effects for SA objectives on net zero carbon and resilience to climate change. The policy provides guidance on reporting, limiting embodied carbon, building end of life, and demolition audits.

6.50 **Policy EM15: Noise** – new policy since noise issues associated with new development had not been addressed in the adopted Local Plan (2017). Noise pollution is an acknowledged issue for human health and wellbeing, and can also affect sensitive animal, bird or insect species. The policy applies to noise pollution and/or disturbance on amenity and biodiversity/surrounding

environment and thus, provides mitigation measures to support Sa objectives to reduce noise pollution.

6.51 **Policy IM1: Developer Contributions for Infrastructure** – minor updating, including the addition of "blue" to green infrastructure. This policy continues to support the overall development in the Plan and helps ensure that the likely effects from new development on infrastructure is mitigated, and including consideration of cumulative effects.

City Centre

6.52 **Policy CC1: Coventry City Centre – Part A Development Strategy** remains relevant with updating and provides an overarching framework for development in the City Centre. Policy wording aligns with the Tall Buildings Design Guide & View Management Framework SPD (2022)[88] prepared and adopted since the extant Local Plan (2017). The retained and updated policy aims for the city centre to continue to be developed and regenerated to ensure a truly world class city centre. The policy clauses align with many of the SA objectives indicating positive effects, especially significant for supporting inclusive economic growth and enhancing the quality and character of townscapes. Positive effects are predicted for SA objectives on communities, services and facilities, health, housing, sustainable transport, soils, and protecting the historic environment.

6.53 Previous Policy CC2 on heritage has been deleted and incorporated into Core Policies HE2 and HE4. Previous Policy CC3 on building design has been deleted as it is covered within Core Policy DE1. Previous Policies CC5-7 have been deleted as they are now addressed within Core Policy DE2 as such matters are applicable city wide, not just the city centre. Previous Policy CC7 on tall buildings has been deleted as this matter is now addressed within Core Policy DE1. Plan Policies – DE1, DE2, HE2 & HE4 are now applicable to the whole Coventry area, not just the city centre – and thus, with wider positive effects.

6.54 Previous Policy CC8 on blue and green infrastructure is now Policy CCI Part B. Previous Policy CC9 on drainage and flood risk is now Policy CC1 Part C. Previous Policy CC10 on environmental management is now Policy CC1 Part D. Previous Policy CC11 on accessibility is incorporated into other AC CLP policies and referenced in Policy CC1 Part E. Previous Policies CC12 to CC26 now all incorporated into Policy CC1 Part E Character Areas.

6.56 **Policy CC1: Coventry City Centre – Part B Green and Blue Infrastructure** sets out requirements specific to the City Centre and requires consideration of the emerging Green and Blue Infrastructure Strategy that will provide further details and guidance. Thus, the policy provides strong mitigation measures to protect blue and green infrastructure. Opportunities to add greenery to areas adjacent to the Ring Road will be encouraged, together with new accessible green spaces – indicating further mitigation and possibilities for positive

[88] https://www.coventry.gov.uk/downloads/download/7391/tall-buildings-design-guide-and-view-management-framework-spd

effects that may be synergistic and cumulative, especially in the longer term and linking to the wider nature networks.

6.57 **Policy CC1: Coventry City Centre – Part C Drainage & Flood Risk** sets out requirements to be in line with requirements of Policy EM4. This recognises that there could be higher levels of impermeable areas within the city centre and by retaining specific policy, mitigation measures are strengthened.

6.58 **Policy CC1: Coventry City Centre – Part D Environmental Management** is retained with such mitigation measures strengthened since clause (g) requires proposals to have regard to all other relevant policies within the Local Plan (and not just within the city centre).

6.59 **Policy CC1: Part E City Centre Character Areas** – new policy that requires all development in the City Centre to reference the relevant character area of its location and to deliver high quality contextually responsive proposals. The policy identifies eleven character areas as follows: Friargate Area; Cathedral & Cultural Area; Civic Area; Far Gosford Street Area; Stoney Stanton Road Area; Corporation Street Area; Mixed Use Retail Core; Parkside Area; University & Enterprise Area; Northern Regeneration Area; and Warwick Row Area. This updated identification of character areas better describes the receiving communities and environments such that the design of new development may better mitigate potential negative effects and enhance potential positive effects. No significant negative effects and overall positive effects for many SA objectives, especially significant for supporting sustainable inclusive economic growth, housing for all, inclusive communities, and sustainable transport.

6.60 The policy requires all development to preserve and enhance the historic environment of the area and in accordance with Conservation Area Appraisals and Plan. This ensures that there are adequate mitigation measures in place for SA objectives on the historic environment. High quality development guided by the local character areas will help ensure further positive effects for SA objectives on townscape character, sense of place, and visual amenity. It will also help resolve existing sustainability problems by continuing to encourage high quality regeneration that will not only have positive effects on townscape but also other interrelated SA objectives on the economy and people's health and wellbeing.

6.61 The summary findings of the SA are presented in the Table 6.1, as follows:

SA of CLPR Policies

Table 6.1: Summary of SA Findings for CLPR Policies

SA Objectives Local Plan Policies	1. Communities	2. Services & Facilities	3. Health & Active Living	4. Housing	5. Economic Growth	6. Net Zero Carbon	7. Resilience to Climate Change	8. Sustainable Transport	9. Reduce Pollution	10. Natural Resources [89]		11. Nature & Biodiversity	12. Historic Environment	13. Townscapes & Landscapes
DS1-DS4 Overall Development Needs & Sustainable Development	+	++	+	++	++	+	+	0	0	0	0	+	0?	+
HW1 Health & Health Impact Assessment	+	+	++	+	+	0	0	0	0	0	0	0	0	0
JE1–JE8 Economy & Employment	+	0	+	0	++	+	+	0	0	0	0	0	0	0
H1-H13 Housing	++	++	++	++	0	+	+	+	0	0	0	0	0	0
R1-R6 Retail	+	++	+	0	++	0	0	0	0	0	0	0	0	0
CO1-CO3 Communities	++	++	+	0	0	0	0	0	0	0	0	0	0	0
GB1-GB2 Green Belt	+	0	+	0	0	0	0	0	0	+	0	+?	+	++
LGS1 LGS, GE1 Green Infrastructure, GE2 Green Space, GE3 Biodiversity, GE4 Trees	+	+	++	0	0	0	+	0	0	+	0	++	0	++

[89] First cell refers to land/soil & water resources; second cell refers to minerals & waste

DE1 Ensuring High Quality Design DE2 Delivering High Quality Places	++	0	++	0	0	0	0	0	0	0	0	0	0	++
HE1 Conservation Areas, HE2 Assets, HE3 Charterhouse, HE4 Archaeology	+	0	+	0	0	0	0	0	0	0	0	0	++	+
AC1-AC7 Transport	+	0	+	0	0	0	+	++	+	0	0	0	0	+
EM1-EM15 Environmental Management	+	0	++	0	0	++	++	0	++	++	++	+	0	+
CC1 (Parts A-E) City Centre	++	+	+	++	++	0	0	++	0	+	0	+	++	++

7.0 SA FINDINGS FOR THE IMPLMENTATION OF THE COVENTRY LOCAL PLAN REVIEW TO 2041AS A WHOLE

Introduction

7.1 This section presents an assessment of the likely significant effects of the pre-submission draft Coventry Local Plan (to 2041) as a whole. It considers the plan objectives, strategic approach, policies and site allocations - and the likely cumulative effects on each of the SA objectives. Many of the likely effects of the draft plan as a whole are interconnected. The Local Plan recognises the interconnectedness of sustainable development topics. The key objectives of the One Coventry Plan that are relevant to development planning are aligned with the Local Plan policies to show how the plan can help deliver its vision and priorities – increasing economic prosperity; improving outcomes and tackling inequalities within communities; and tackling causes and consequences of climate change.

To enable vibrant & inclusive communities

7.2 Significant positive effects are predicted through the housing polices H1-H13 that will overall provide the identified needs for housing, thus supporting communities. Policy H3 reflects updated standards and requires adaptable and accessible buildings, indicating positive effects. Policy H4 seeks to secure a mix of housing and Policy H6 addresses specific requirements for affordable housing, resulting overall in dwellings of varying tenures, sizes and types being delivered over the plan period. Policies DE1 and DE2 seek to promote diverse, viable places with high quality design, good environmental quality and healthy communities – all contributing to positive effects for vibrant communities. Policy AC4 requires safe, comfortable and convenient access to cycling and walking routes – appropriate for all abilities and needs, including wheelchair accessible routes – further positive effects for inclusivity.

7.3 Policy H7 addresses the needs of gypsy and traveller communities. Policy H8 supports those needing care, nursing, or for older persons and Policy H10 addresses the specific needs of students. Policy H9 requires that proposed development density should relate to local character and context, thus with likely positive effects for social connectivity. In order to promote social inclusivity it will be important that residents can benefit from good access to a range of services and facilities. Policies CO1-3 consider social, community and leisure facilities, together with neighbourhood and community planning. Overall, cumulative minor positive effects for inclusivity and communities.

To provide accessible essential services & facilities for all residents

7.4 Policy DS4 sets out general masterplan principles that includes consideration of social and community facilities. Policies CO1-2 address social, community and leisure facilities. Policy GE1 promotes protection and enhancement of green and blue infrastructure. Overall, minor positive effects.

To improve health & promote active living

7.5 Overall, most of the Local Plan policies are expected to contribute to improving health as provision of good quality housing, support for employment and communities, together with good environmental quality will contribute to health and wellbeing. The importance of promoting health improvements is evidenced specifically through policy HW1 that requires all major developments to undertake a Health Impact Assessment in line with the HIA SPD. Other policy requirements for good quality housing and accessibility to open/green space will contribute to health and wellbeing.

7.6 The proposed site allocations are close to healthcare facilities, and also open space, green and blue infrastructure, recreation and leisure facilities, and sustainable transport modes. Policies LGS1 and GE14 protect and enhance nature and green space with its importance for health. This will be cumulative in the longer term as networks are enhanced and recovery strategies implemented. Policy AC4 presents the Council's emphasis on prioritising walking and cycling and includes a requirement for accessibility for all abilities and needs, supporting active transport with positive effects for health. This is all supported by environmental management policies to reduce pollution and improve quality – Policies EM1-EM15. Over time, this should result in cumulative effects that may be synergistic and will help towards reducing an existing sustainability problem of health inequalities in the Coventry area.

To provide decent and affordable housing for all

7.7 The Local Plan makes provision to deliver at least 29,100 new dwellings during the period up to 2041 and supports delivering a mix of homes through a range of policies H1-H13 with major positive effects for SA objectives. Policy H4 seeks to secure a mix of housing and Policies H6, H7, H8, and H10 address the needs of specific people, including the young, affordable needs, and gypsy/travellers. Policy H8 addresses the needs for older people and supported housing/care. Policy H11, H12 and H13 consider the specific requirements for homes in multiple occupation, build to rent, and co-living housing.

7.8 The residential site allocations will contribute to the provision of housing within the Coventry area, including significant proposals such as City Centre South and the Friargate mixed use scheme in the City Centre. Policy H5 helps ensure that the best use is made of existing housing stock, including an emphasis on re-sue and support for retrofitting – with further positive effects. Overall, major positive effects for SA housing objectives and that will be cumulative, particularly in the longer term.

To support sustainable inclusive economic growth

7.9 Strategic Policy JE1 sets out the overall strategy for economy and employment and Policy JE2 has reviewed and updated the provision of employment land and premises. Policies JE3-8 provide further details and information for different types of employment use, with particular significant positive effects indicated for the differentiation between industrial

storage/distribution and R&D uses into two policies JE5&JE8. The review of the plan has updated employment land need particularly taking into account the changes for office requirements. Policy JE4 includes a new requirement for flexibility and adaptability to changing needs with positive effects for SA objectives.

7.10 Site allocations are retained from the adopted plan and one new site option was considered but found to be unsuitable. The Council is able to find suitable land for employment within the Coventry area approaching its identified need, and it will continue to discuss and cooperate with neighbouring Councils as well as considering any sites that may be proposed in the future. Overall, the Plan will have significant positive effects for SA objectives to support inclusive economic growth; further positive effects are indicated for health and wellbeing and communities.

To help achieve the Council's ambition to reach net zero carbon emissions

7.11 A key emphasis of the new Coventry Local Plan is to support the One Coventry Plan priority regarding climate change and to support the draft Climate Change Strategy[90]. The new Policies EM11-EM14 address operational carbon to ensure that buildings are fit for purpose with regard to reduced energy consumption and integration of design to address climate change adaptation through the revised national Building Regulations and local requirements. Overall, likely to be significant positive effects for SA objectives to reach net zero carbon emissions – especially in the longer term as new methods in the construction industry become established.

To build resilience to climate change

7.12 Policy EM1 Planning for Climate Change Adaptation has been updated to address overheating in new buildings, enhance water efficiencies, consider water neutrality and greywater recycling, and all development must meet net zero (regulated operational carbon). Together with the retained details for sustainable water management in Policies EM4-5, significant positive effects are indicated, particularly in the longer term as the effects become cumulative.

To reduce traffic and improve sustainable transport choices

7.13 The Council has assessed possibilities for allocating suitable sites for new development and carefully selected and retained those sites that are close to services and facilities. The City is well connected with accessible options such that this approach indicates positive effects for SA objectives on improving sustainable transport and reducing car travel. Policies AC1-AC4 have had considerable updating to reflect latest national policy and guidance, and support the Council's emphasis on prioritising sustainable travel. Overall, the approach to site allocations and transport policies will have likely positive effects for SA objectives on sustainable transport. These

[90] https://www.coventry.gov.uk/draftclimatechangestrategy

may become synergistic and cumulative in the medium to longer term as the modal shift becomes established – and with further positive effects for health and wellbeing, nature, and climate change.

To reduce air, noise and light pollution

7.14 Policy EM7 is retained for air quality and the Plan includes the new Policy EM15 on noise; light pollution is addressed in Policy H3 Housing and Policy DE2 Delivering High Quality Places. Therefore, overall, there are sufficient mitigation measures to ensure no significant negative effects on SA objectives for air, noise or light pollution.

To protect and conserve natural resources – soil, water, minerals and waste

7.15 Policy EM6 on redevelopment of previously developed land is retained and updated to align with water efficiency targets. This will continue to provide sufficient mitigation to support sustainable water management. Policies EM 8&9 continue to guide waste and minerals planning such that SA objectives are supported with no significant negative effects overall.

To protect and enhance nature and biodiversity

7.16 A Habitats Regulations Assessment (HRA) Screening (August 2024) concluded that there is no requirement for the Coventry Local Plan to include any policy regarding European and internationally designated sites for nature conservation. Policy GE3 continues to protect national and locally important biodiversity and has been updated to incorporate the new national minimum requirement for 10% net gain in biodiversity for all new development. Policies GE2-3 with minor updating continue to provide information and guidance such that the green/blue infrastructure network in the plan area should be enhanced, particularly in the longer term and networks are linked, widened and become more established with overall positive effects for SA objectives for nature and biodiversity.

To protect and enhance the historic environment, and its setting

7.17 Policies HE1-4 continue to provide strong mitigation measures to protect the historic environment such that there should be no significant negative effects and there are possibilities for enhancement, for example, through the refinement of character areas in the City Centre and support for high quality regeneration.

To protect and enhance the quality and character of townscapes and landscapes

7.18 Policy GB1 Green Belt has been strengthened through confirmation of the quality and importance of the Green Belt for Coventry (Technical update, 2024) and by differentiating between Green Belt and Local Green Space. This

updated evidence and policy has guided other policies, including site allocations, in the Plan such that positive effects are indicated for SA objectives for the Green Belt and to retain its five purposes.

7.19 The updating of Policies on design and high quality places DE1-2, together with Policies LGS1 and GE1-4 will overall interact and indicate positive effects for SA objectives on protecting and enhancing local character, visual amenity, and restoration of degraded townscapes/landscapes – likely to be cumulative, especially in the longer term.

8.0 MONITORING

8.1 The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance[91] on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication. Details of monitoring arrangements may be included in the sustainability appraisal report, the post-adoption statement or in the local plan itself. Government requires local planning authorities to produce Monitoring Reports (AMRs), and the Coventry Authority Monitoring Report (AMR)[92] (produced annually) is considered sufficient to ensure appropriate monitoring takes place.

[91] https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal
[92] https://www.coventry.gov.uk/downloads/download/2678/annual_monitoring_reports

9.0 CONSULTATION & NEXT STEPS

9.1 This SA Report is being published alongside the Proposed Submission draft Coventry Local Plan Review for Regulation 19 consultation during autumn 2024. Any comments on the SA will be taken into consideration at the next stage when the Council will submit the draft Coventry Local Plan for examination by an independent planning inspector.

APPENDICES:
Available as a separate document

I **Statement of Compliance** (August 2024)

II **SA Scoping Report** (March 2023, available on Council's website)

III **SA of Strategic Options** (May 2023 & August 2024)

IV **Consultation Representations on the Initial SA Report** (May 2023)

V **SA of Proposed Site Allocations** (August 2024)

Coventry Local Plan Review 2021-2041: Proposed Submission Regulation 19 Consultation

Sustainability Appraisal (SA)/ Strategic Environmental Assessment (SEA)

SA Report:

APPENDICES

September 2024

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Appendix I: Statement on Compliance with SEA Directive & Regulations

The EU SEA Directive[1] (Annex 1) requires certain information to be provided in the Environmental Report. This requirement is implemented into UK legislation through the SEA Regulations (2004)[2]. This is Appendix 1 of the Sustainability Appraisal Report that constitutes the Environmental Report as required by the SEA Directive and the UK SEA Regulations.

This Appendix 1 sets out how the requirements for SEA have been met and signposts where this information is found in the Sustainability Appraisal Report (August 2024) – and in accordance with paragraph 32 of the National Planning Policy Framework (updated, 2023)[3].

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
An outline of the contents, main objectives of the plan and relationship with other relevant plans	Section 1 Introduction	Sets out the Vision and main Objectives of the Coventry Local Plan Review
	Section 3 Context & Baseline	Summarises the relationship with other plans and references the detailed review provided in the SA Scoping Report (2023)
The relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan	Section 3 Context & Baseline	Summarises the relevant baseline conditions for sustainability (including the state of relevant environmental aspects) in the Coventry LP area. The information is set out in more detail in the SA Scoping Report (2023) that also indicates the likely evolution of current conditions and trends where available
The environmental characteristics of the area likely to be affected	Section 3 Context & Baseline	Summarised in Section 3 of Main SA Report; where relevant and available this information is detailed in the SA Scoping Report
Any existing environmental problems which are relevant to the plan including, in particular, those relation to any areas	Section 3 Context & Baseline	Summarises existing sustainability (including environmental problems) for the Coventry LP area. This section also summarises information for

[1] http://ec.europa.eu/environment/eia/sea-legalcontext.htm
[2] http://www.parliament.uk/documents/post/postpn223.pdf
[3] https://www.gov.uk/government/publications/national-planning-policy-framework--2

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
of a particular environmental importance		Natura 2000 sites in line with Habitats Regulations Assessment requirements (HRA Screening Report available separately, July 2024).
The environmental protection objectives relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation	Section 2 SA Methods Section 3 Context & Baseline	Provides the summary of objectives for sustainability in the Coventry LP area (including environmental objectives) and the implications of these objectives for the CLPR (refers to details in the SA Scoping Report 2023); explains how the environmental considerations have been taken into account.
The likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects	Section 2 SA Methods Table 2.1	Presents the SA Framework of objectives that shows which of the issues listed by the SEA Regulations are progressed by which SA objectives. This ensures that all the issues are considered during the assessment of each element of the emerging CLPR since each policy & proposal is assessed against each SA objective.
	Sections 4, 5, 6 & 7 Appendices III & V	Summarises the likely significant effects of implementing the CLPR (including environmental effects) with details provided in the appendices. Where possible, an indication is given of whether the effect is likely to be cumulative, short, medium and long term
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan	Sections 4, 5, 6 & 7 Appendices III & V	Where potential significant negative effects are predicted the SA has sought to provide suggestions for mitigation possibilities. These are summarised in the main report, and detailed in the appraisal matrices that comprise the appendices.
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information	Sections 4 & 5 Tables 4.2b – 4.10b	Strategic Options for Quantum of Housing, Residential Density, Building Regulations Standards, & Biodiversity Net Gain were appraised through initial SA (March 2023). Subsequently, additional options & refinements of options were appraised – explained & findings reported in Section 4. Options for site allocations are discussed in Section 5. The reasons for progressing options and not taking others forward is set out in Tables 4.2b to 4.10b.

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
	Sections 2 & 3 Methods & Context, Baseline	Outlines how the assessment was undertaken – the appraisal methodology and difficulties encountered in compiling information are noted.
A description of the measures envisaged concerning monitoring	Section 8	Provides measures proposed for monitoring the sustainability (and environmental) effects of the implementation of the Coventry LP.
A non-technical summary of the information provided under the above headings	Report preface (available separately)	Provides a non-technical summary.

Coventry Local Plan Review: Sustainability Appraisal (SA) Appendix III: SA of Strategic Options

IIIa: Options for Quantum of Housing Needs 2022-2041	
1	63,760 dwellings (3,188 per annum) – Government standard method[4] (with ONS population projections from 2014)[5]
2	39,280 dwellings (1,964 per annum) – HEDNA method[6] (with census population data from 2021)
3	29,100 dwellings (1,455 per annum) – HEDNA method as per Option 2 but minus 35% uplift for largest urban authorities[7]
4	Approx. 31,500 dwellings (1, 575 per annum) – calculated as quantum that can be accommodated based on supply figures
5	30,500 dwellings (1, 527 per annum) – calculated through proposed new standard method for assessing housing needs (July 2024)[8]

IIIb: Options for Residential Density	
1	Greenfield 30 dph[9]; outside ring road minimum 35 dph; inside ring road minimum 200 dph. Current CLP Policy H9
2	As Option 1 but with >35 dph outside ring road – in certain locations
3	Greenfield 35 dph; Brownfield 45 dph; 125 dph in defined transition zone; 250 dph within City Centre boundary

IIIc: Options for progressing Coventry's Climate Change Strategy[10]	
1	Planning policy requirements in line with national Future Homes Standard[11] & Future Buildings Standard[12] covering energy efficiency, ventilation and overheating through Building Regulations
2	Planning policy requirements that are over and above proposed Building Regulations to better progress Coventry's aspirational ambitions for addressing climate change effects

[4] https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments
[5] The ONS population data for Coventry has been found to be erroneous & overestimated. For example, please see: https://osr.statisticsauthority.gov.uk/correspondence/sir-andrew-watson-to-ed-humpherson-and-sir-david-norgrove-population-projections-and-mid-year-population-estimates-for-coventry/ and https://osr.statisticsauthority.gov.uk/wp-content/uploads/2021/05/Review-of-population-estimates-and-projections-produced-by-the-Office-for-National-Statistics.pdf
[6] Housing & Economic Development Needs Assessment (HEDNA, November 2022) Iceni Projects Ltd on behalf of Coventry & Warwickshire Local Authorities https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna
[7] Government changes (rev December 2020) to the planning system include a 35% uplift to the housing number generated by the standard method for the 20 most populated cities & urban centres in England – and Coventry is on the list of 20 https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments
[8] https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system#chapter-4--a-new-standard-method-for-assessing-housing-needs
[9] Dwellings per hectare
[10] Coventry's draft Climate Change Strategy 2023-2030 https://www.coventry.gov.uk/downloads/download/7434/coventry-s-draft-climate-change-strategy that aims for "*The dramatic reduction of carbon emissions to achieve carbon neutrality with a 100% reduction to 1990 levels by 2050 at the very latest*"
[11] For example, please see: https://www.futurehomes.org.uk/delivery-at-scale
[12] https://www.gov.uk/government/consultations/the-future-buildings-standard

IIId: Options for Nature & Biodiversity	
1	Planning policy requirements in line with national requirements & standards, including 10% Biodiversity Net Gain (BNG)[13], and Green Infrastructure (GI) standards[14]
2	Planning policy requirements that are over and above national requirements for BNG & GI standards

IIIe: Options for Development in the Green Belt	
1	Potential for development within the Green Belt
2	No potential development within the Green Belt

IIIf: Options for Quantum of Employment Land	
1	147.6 ha general industrial (excluding strategic B8) – HEDNA (2024)
2	60 ha general industrial calculated as quantum that can be accommodated
3	60 ha plus an additional 11.81 ha being promoted & located in the Green Belt (Site North of A45 & West of Brick Hill Lane)

IIIg: Options for Quantum of Office Development	
1	8.5 hectares offices (HEDNA), assume 85,000 sq m
2	5.8 hectares offices (HEDNA less 2.7 hectares oversupply as per the ELR office market addendum) assume 58,000 sq m
3	4.12 hectares offices (reduced land take for offices as per the ELR office market addendum based on allowance of 10sqm per full time employee instead of 14sqm assumed previously, to allow for increased flexible and hybrid working patterns. This broadly equates to the more high level 30% reduction assumed by the HEDNA) (overall, 41,200 sq m)

IIIh: Options for Distribution of Office Development	
1	City Centre focus including Friargate
2	A more dispersed approach
3	City centre focus to include 39,549 sqm floorspace at Friargate[15] and the rest distributed to other defined centres (overall, 41,200 sq m)

[13] Environment Act 2021, and for example, please see https://consult.defra.gov.uk/defra-net-gain-consultation-team/consultation-on-biodiversity-net-gain-regulations/
[14] https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx
[15] An office block was constructed in 2022 (12,449 sq m) leaving 27,100 sq m at Friargate & 1,451 sq m elsewhere

IIIi: Options for Purpose Built Student Accommodation (PBSA)	
1	Retain Policy H10 Student Accommodation as adopted Plan (2017)
2	PBSA to be located at campus/city university area unless evidence demonstrates otherwise on a case by case basis

Key: Categories of Significance		
Symbol	**Meaning**	**Sustainability Effect**
- -	Major Negative	Problematical & improbable due to known sustainability issues; mitigation difficult and/or expensive
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
+	Minor Positive	No sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing sustainability problem
?	Uncertain	Uncertain or Unknown Effects
0	Neutral/Neutral	Negligible effects or not applicable
SA No 10 split cell – first symbol refers to land/soil & water resources; second symbol refers to minerals & waste		

IIIa: Options for Quantum of Housing Needs 2022-2041	
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		Options for Quantum of Housing				
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	**1. Standard Method (2014) – 63,760 dwellings**	**2. Standard Method (HEDNA 2022) – 39,280 dwellings**	**3. Standard Method less 35% Uplift (2022) – 29,100 dwellings**	**4. Quantum that can be accommodated – approx. 31,500 dwellings**	**5. Proposed Standard Method (2024) – 30, 540 dwellings**
1: To enable vibrant and inclusive communities	There is a need to plan for a growing, changing, ageing and increasingly diverse population that will need increasing participation and involvement to help maintain social cohesion and reduce risks for radicalisation and social exclusion. The total population of Coventry City Council[17] administrative area was 345,300 with an 8.9% growth in population from 2011 to 2021 – and this is higher than the rate in the West Midlands 6.2% and England 6.6% - and with a high	+	+	+	+	+

[16] https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system#chapter-4--a-new-standard-method-for-assessing-housing-needs
[17] https://www.coventry.gov.uk/facts-coventry/population-demographics

	number of young people aged 20-24. It is predicted to increase to 422,919 by the year 2031 and to 454,534 by the year 2042. In line with the rest of England, this is an ageing population. The provision of new good quality homes will have positive effects for people. It could be asserted that higher figures of new homes, as in Option 1, could have more positive effects as more new homes could be available to more people – but the higher quantum of new development could overload the capacity of existing communities to absorb new people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies, rather than the overall quantum of housing. For example, extant Policy H7 covers Gypsy & Travellers, Policy H8 covers the needs of an ageing population, and Policy H10 covers student accommodation. Policy H4 secures a mix of housing and Policy H6 covers affordable housing – the encouragement of mixing should support a wider range of social connectivity and community interaction – all with positive effects for all five options. The Housing Topic Paper & the HEDNA discuss the possibilities for a new Policy on Co-Living – and this is likely to encourage safe social connectivity and could encourage community participation – all particularly for the younger people who would be interested in this form of housing – positive effects for all five options. Thus extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs. The majority (66.6%) of Coventry's total population is White British, such that Coventry has a notably higher percentage of ethnic					

	minority groups compared to the regional and national averages[18]. However, over the past decade, the city has become increasingly ethnically diverse with just under half of its school-aged population from an ethnic minority background in 2021. There are many factors that may be contributing to the changing ethnic composition, such as differing patterns of ageing, fertility, mortality, and migration – and it is not clear how policies for new homes can support inclusivity for such groups in communities. **SA Suggestion at Regulation 18**: Is there any scope for considering any particular housing needs from cultural, ethnic or migrants/refugees groups and can the new development plan contribute to encouraging more social inclusivity for these groups?					
2: To provide accessible essential services and facilities for all residents	As communities grow and change, the provision of, and access to, community and social facilities and services, needs to be maintained and improved for social and health wellbeing. This includes access for all to Green Infrastructure [and this is discussed further in SA No 11 Nature & Biodiversity]. It could be asserted that the higher figures of new homes, as in Option 1, could have more negative effects as the higher quantum of new development could overload the capacity of services & facilities for residents. However, larger scale developments may be better able to support provision of new services & facilities. It is likely that the lower quantum of new housing in Options 3, 4 & 5are less likely to overload the capacity of services & facilities with less negative effects and overall more likely positive effects. The location of new development is guided by specific policies – and these consider accessibility to physical, social & green infrastructure – including sufficient mitigation measures to ensure that services & facilities are sufficient, for example, Policy IM1 Developer Contributions. Policy H2 lists housing allocations that have been	+	+	++	++	++

[18] (ONS, 2021) https://www.coventry.gov.uk/facts-coventry/population-demographics

	assessed & identified to be in suitable locations, including for provision of, and accessible, services & facilities, including sustainable/active transport, social & community facilities, education & training, and green infrastructure. The review will update these policies. Policies C1-3 specifically address communities. **SA Suggestion at Regulation 18**: Policy review could consider encouraging facilities that are adaptable to future changes in population demographics and technology. It could encourage & support people to lead healthy & active lives, and ensure that facilities are accessible to all groups, including those with physical or mental disabilities.					
3: To improve health & promote active living	As life expectancy is below average and health outcomes are worse in the more deprived areas of Coventry, a targeted approach has been identified by the JSNA[19] to give appropriate support to each group to improve health and wellbeing for all rates. There is also a shift to focus on to prevention that will need a community-informed and culturally competent approach. The Index of Multiple Deprivation (IMD)data (2019)[20] for Coventry City indicates a range of deprivation (from least to most deprived) throughout the wards with the most deprived tending to be found in the city centre and radiating out towards the north/north-east, to the south-east and with a grouping of wards located near the boundary to the south-west. Inequalities in health arise out of inequalities in society. Coventry became a Marmot City[21] in 2013 and is committed to reducing inequality and improving health outcomes for all. In 2019, the key focus is on children and young people, and following the impact of Covid19 on the city, also prioritising the effect on ethnic minority group communities. Healthy ageing is a challenge throughout England. There are complexities of planning for health due to the multiple determinants and the need for cross-sectoral understanding and collaboration with linkages between the global	**+?**	**+?**	**+**	**+**	**+**

[19] https://www.coventry.gov.uk/facts-coventry/joint-strategic-needs-assessment-jsna
[20] https://coventry-city-council.github.io/imd/2019/
[21] https://www.coventry.gov.uk/policy-1/coventry-marmot-city

	ecosystem, the natural and built environments, the local economy with communities, people, and their lifestyles. Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental[22]. These factors are covered by the following SA Nos 4 & 5. Overcrowding is more likely to be experienced by minority ethnic groups[23] – and this might occur as a result of multiple generations of a family living in one home. There can be reduced isolation but there are health risks associated with overcrowding. Provision of identified need through appropriate density & quality can help resolve such an existing sustainability problem. It could be asserted that higher figures of new homes could have more positive effects as more new homes could be available to more people. However, the effectiveness of reducing health inequalities is likely to be associated with the location of new development. In consideration of the land constraints in Coventry, the higher quanta of housing are likely to be difficult to accommodate - homes may need to be small, more densely located and thus less able to meet the variety and adaptability of needs. Such quanta would also place pressures on the capacities of the open/green spaces in the city – and thus, limit the health and wellbeing associated with such spaces. Overall, some uncertainties of significance of effects for Options 1 & 2; positive effects more certain for development that can be accommodated – Options 3, 4 & 5. The extant Local Plan includes site allocations (H2 Housing; JE2 Employment Land) and other policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have					

[22] For example: https://commonslibrary.parliament.uk/research-briefings/cbp-9414/
[23] The Marmot Review 10 Years On (February 2020) https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on

	negative effects for health and wellbeing. The review will update policies. Through Policy HW1 of the current Plan, applicants are required to mitigate against potentially negative health impacts. The Health Impact Assessment SPD[24] provides information and guidance on completing the relevant health toolkit and HIA. This is a proactive approach in plan-making and provides mitigation to ensure that there are no negative effects on health from new development. **SA Suggestions at Regulation 18**: Can the Plan consider reducing deprivation with particular regard to deprivation pockets in Coventry, thus supporting the targeted approach identified by the JSNA? Policies addressing the ageing population could consider adaptability & improving resilience (both physical & cognitive) for housing the elderly. Can design principles or requirements create safer neighbourhoods & help reduce crime, including violence – especially against women and girls? Are there particular issues for health & overcrowding, perhaps associated with ethnic minority groups?					
4: To provide decent and affordable housing for all	New demographic projections have been modelled (HEDNA 2022)[25] to estimate the amount and type of housing that will be needed over the period to 2041. The older person population is projected to increase notably in the future and an ageing population means that the number of people with disabilities is likely to increase substantially. Self-build and custom housebuilding[26] is a growing sector of the housing market, and one which has potential to contribute to housing delivery. There is also the potential for co-living[27] to be considered. It is understood that there is a sizeable amount of student	**+?**	**++?**	**++**	**++**	**++**

[24] Health Impact Assessment (HIA) Supplementary Planning Document (SPD)https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2
[25] https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna
[26] https://www.gov.uk/guidance/self-build-and-custom-housebuilding
[27] For example, please see https://coliving.com/what-is-coliving

	accommodation in Coventry and, if delivered, provides the potential to reduce the number of students in the wider housing market. It may be asserted that opportunities to provide decent and affordable housing for all is more likely with the higher quanta of housing in Options 1 & 2 – if such numbers of homes could be accommodated within the constraints of the city area. Homes may need to be small, more densely located and thus less able to meet the variety and adaptability of needs – and therefore, uncertainties for significance of effects for Options 1 & 2. However, capacity (HELAA 2024[28]) and viability studies have indicated that Options 3, 4 & 5 could deliver the identified need for housing indicating major positive effects for housing objectives. Therefore, positive effects likely for all five options but uncertainties of significance for the higher quanta of housing numbers. Whilst delivery has not been an issue for the Council[29], there must be some uncertainty about availability of suitable land in sustainable locations to accommodate the higher quanta of housing in Options 1 & 2, and to meet with other objectives, particularly for climate change & biodiversity. The city has tight boundaries and constrained opportunities to grow within them, such that the Council will continue to work closely with its neighbouring authorities for shared opportunities. Therefore, uncertainty of significance of positive effects for Options 1 & 2. In 2020/21[30] the delivery of affordable housing was below the annualised need (although an increase in percentage from 7 to 13 % on 2019/20), and the updated policies will need to take this into account. As PBSA schemes are built, Homes in Multiple Occupation (HMOs) will become available for the wider housing market. It is					

[28] Coventry City Council (2024) Housing & Economic Land Availability https://www.coventry.gov.uk/planning-policy/local-plan-review/3
[29] See AMR 2021/22 https://www.coventry.gov.uk/downloads/file/39439/authority-monitoring-report-2021-22
[30] https://www.coventry.gov.uk/downloads/file/37391/authority-monitoring-report-2020-2021

	important to address any imbalance in the distribution of affordable housing. Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The Affordable Housing SPD (March 2022)[31] provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built – all with likely major positive effects. The need to improve the quality of the existing housing stock remains, especially with regard to damp and poorly insulated homes. Climate change commitments will require, amongst other things, retrofitting existing homes to ensure that they are up to modern insulation standards (and see later SA No 6 Net Zero Carbon & SA No 7 Resilience to Climate change). **SA Suggestion at Regulation 18**: ▪ Is there any scope for considering any particular housing needs from cultural, ethnic or migrants/refugees groups?					
5: To support sustainable	Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. The	**--?**	**-?**	**+?**	**+?**	**+**

[31] https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd

inclusive economic growth	initial evidence indicated that employment need could be met from renewal of existing sites and redevelopment[32]. The HEDNA (Nov 2022) considered population, housing growth and the economy in tandem based on the 2021 census figures. Capacity (HELAA 2024) and viability studies have indicated that Options 3, 4 & 5 may be able to be accommodated, indicating minor positive effects for employment objectives but with some uncertainty of significance at this stage until more studies are undertaken. It is unlikely that the higher quanta of housing in Options 1 & 2 could be accommodated due to the constraints within the Coventry boundary. The higher quanta in Options 1 & 2 could require re-allocation of some employment land and/or result in increased commuting for work (with further implications for other SA objectives, such as transport). It remains uncertain how the effects of Covid-19 on changing patterns of working, such as home working, co-working & hybrid working, will affect requirements for employment land during the plan period.					
6: To help achieve the Council's ambition to reach net zero carbon emissions	The Council recognises the climate crisis and is currently reviewing its Strategy[33]. This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure. All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions. Following consultation in 2023, Government intended to publish the Future Homes & Buildings Standards (FHBS) in 2024[34] and then bring it into force in 2025. All new homes will then be 'zero carbon-ready', meaning that they will be zero carbon - once the electricity grid has	**+?**	**+?**	**+**	**+**	**+**

[32] https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna

[33] A Green Future for a Changing City(2022 – 2030) https://www.coventry.gov.uk/draftclimatechangestrategy

[34] https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation

	been decarbonised[35],[36]. The UK has committed to decarbonise the electricity system by 2035[37] and the updated policies in the CLPR will reflect this commitment in consideration of the plan period to 2041. Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, as well as those that encourage active travel through location of new development in sustainable locations with sustainable transport – Policy AC1 Accessible Transport & Policy H1 Allocations, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) Since all new development will need to meet requirements from updated policies, it is likely that there will be no significant negative effects for all five housing options – in the longer term, after 2035. Assuming that the required zero carbon trajectory can be achieved, positive effects for climate change objectives are indicated in the longer term. However, there is some uncertainty that the higher quanta of housing in Options 1 & 2 would be able to meet with the enhanced requirements to meet with net zero carbon – particularly in the shorter term. Viability/costs may also be an issue in the shorter term as the construction industry develops new methods. The Council's Energy SPD[38] currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements. The Council is also investigating how it could establish challenging new targets/standards, including consideration of standards higher than Building Regulations, in order to support Coventry's aspirations for addressing the climate change crisis.					

[35] https://www.futurehomes.org.uk/delivery-at-scale
[36] https://www.benuk.net/Decarbonising-the-Grid.html
[37] https://www.gov.uk/government/news/plans-unveiled-to-decarbonise-uk-power-system-by-2035
[38] Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) https://www.coventry.gov.uk/downloads/file/37976/energy-spd

	There is a perception that new building reduces carbon emissions when operational compared to an existing building. However, new buildings incur high carbon emissions from embodied carbon associated with the extraction of raw materials, transport & construction. The VAT levy on new builds at 0-5% compared to 20% for refurbishment is a disincentive for refurbishment. However, refurbishment of buildings is likely to be delivered in a shorter time than new build. High quality refurbishments can inspire as much as new buildings with appropriate design and reuse of buildings can include historic assets – a particular issue for Coventry and with positive effects. **SA Suggestion at Regulation 18**: Circular economy principles[39] for buildings should be considered for inclusion in the updating of policies so that embodied carbon and whole life assessment are requirements for development proposals.					
7: To build resilience to climate change	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK.[40] Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to wellbeing, the economy and the environment. All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. Relevant current policies in the adopted Local Plan include, Policy EM1 Planning for Climate Change Adaptation, Policy EM2 Building Standards, Policy GE1 Green Infrastructure, Policy EM4 Flood Risk Management, and Policy EM5 Sustainable Drainage Systems – and all these will be reviewed & updated. There is some uncertainty that the higher quanta of housing in Options 1 & 2 would be able to meet with the enhanced	**-?**	**-?**	**+**	**+**	**+**

[39] For example, please see RIBA, 2021 https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545
[40] For example, see https://earth.org/climate-change-in-the-uk/

	requirements to build resilience from overheating, flood risk, and extreme weather effects due to the constraints – suitable land & viability (and particularly in the shorter term until technology catches up with requirements & the construction sector can meet with increased needs). Overall, provision of green spaces and sustainable drainage are key elements to progress objectives for climate change. The higher quanta of housing is likely to place greater pressures on these resources with negative effects – therefore, minor negative effects for Options 1 & 2 that will be cumulative in the longer term, but uncertainties of significance at this stage of assessment.					
8: To reduce traffic & improve sustainable transport choices	A key objective remains for the review of the CLP - to improve the sustainability of the transport system in Coventry, improving integration with walking and cycling routes and green infrastructure networks, and promoting more active travel. The Council has aimed to locate new development in sustainable locations – identified through their proximity and accessibility to sustainable transport choices – and reflected in the site allocations in the adopted Plan. This principle will be retained in the review of the policies and will apply to all new development. Due to the predicted increase in population, transport policies need to both encourage sustainable modes and also to discourage car use – for example, through restricted parking, zero emission zones, and reallocation of some road space to sustainable movement options. The Environment Improvement Plan[41] for England includes an aim for half of all journeys in cities to be cycled or walked by 2030 and Coventry's Transport Strategy[42] aims to significantly improve conditions to encourage more people to walk and cycle.	**--?**	**-?**	**0?**	**0?**	**0?**

[41] https://www.gov.uk/government/publications/environmental-improvement-plan
[42] https://www.coventry.gov.uk/transport-strategy-2/transport-strategy

	It is uncertain whether such approaches could mitigate sufficiently for the higher quantum of housing in Option 1. There is considerable uncertainty about the delivery of the higher quantum of housing in Option 1 due to the boundary constraints and limited amount of sustainable transport locations, albeit that the urban parts of Coventry are generally well connected. Therefore, potential for major negative effects with Option 1. The quantum of housing in Option 2 indicates a reduction in potential negative effects on transport objectives but with uncertainty at this stage as significance will vary with locations. The lower quanta of housing in Options 3, 4 & 5 are less likely to be associated with significant cumulative negative effects and therefore, negligible or neutral effects are indicated. Where there is a deficiency in public & sustainable transport, it is generally considered that larger developments, particularly in rural areas, are able to provide & encourage sustainable transport choices as part of an overall package of masterplanning & developer contributions. Coventry is constrained by boundaries and various other factors, including Green Belt (and see SA No 13); however, the urban environment is well connected and with a good transport system. Nonetheless, it is considered that the higher quanta of housing with such overall development pressures could challenge the capacity of public & sustainable transport, and open/green spaces, with potential negative effects. The lower quantum of housing that has been calculated (HELAA, 2024) with urban capacity may facilitate a shift in transport mode to more sustainable options with negligible or neutral effects. There may be some positive effects – especially in the longer term as walking/cycling/GI networks become better linked & more extensive. However, uncertainties of significance at this stage of assessment. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).					

	There may also be an issue from transport and air quality for nitrogen deposition and negative effects on biodiversity and nature sites (see SA No 11) and HRA Report (August 2024). **SA Suggestions at Regulation 18**: Consider revision of policy to include restricted parking & zero emission zones Consider whether more areas of road space would be safe & appropriate for reallocation to cycling & walking – particularly in areas that would link/extend sustainable transport networks. Reuse/refurbishment of existing buildings, including historic assets (and see SA No 12) Consider higher densities in key sustainable locations that meet other Plan objectives					
9: To reduce air, noise & light pollution	In the UK, air pollution has been recently reported (2022) as being the largest environmental risk to public health[43]. Reducing vehicle emissions will continue to improve air quality. Indoor air pollution is becoming an increasing proportion of the problem[44]. Noise pollution is an acknowledged issue for human health & wellbeing – physical & mental - (see SA No 3 and also certain biodiversity see SA No 11), and particularly road traffic noise (see also SA No 8) remains a major problem in Europe[45] & the UK[46]. Significant health impacts are likely to be underestimated, and exposure to environmental noise does not affect everyone equally. Socially deprived groups & groups with increased susceptibility to noise may suffer more pronounced health related impacts of noise. Future urban growth and increased demand for mobility is likely to increase the numbers of people exposed to high levels of noise.	**0?**	**0?**	**0?**	**0?**	**0?**

[43] OHID (updated Feb 2022) Air Pollution: applying All Our Health https://www.gov.uk/government/publications/air-pollution-applying-all-our-health/air-pollution-applying-all-our-health
[44] Chief Medical Officers' annual report 2022: air pollution https://www.sciencemediacentre.org/chief-medical-officers-annual-report-2022-air-pollution/
[45] EEA, 2020 https://www.eea.europa.eu/publications/environmental-noise-in-europe
[46] For example, please see Karen Bakker (January 2023) Noise Pollution is a menace to humanity https://www.theguardian.com/commentisfree/2023/jan/03/noise-pollution-is-a-menace-to-humanity-and-a-deadly-threat-to-animals

	Light pollution disturbance can adversely affect health & wellbeing, including fatigue, insomnia, stress & anxiety[47] (and also certain biodiversity – see SA No 11). Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects. Some uncertainty at this stage of assessment about the effectiveness of mitigation for potential cumulative effects. **SA Suggestions at Regulation 18**: Continue to focus on reducing vehicle use to help reduce air pollution Consider the implications of environmental noise Consider the implications of light pollution explicitly in building design & including the indoor environment Consider cumulative effects Consider the implications of air, noise & light pollution for nature & biodiversity									
10: To protect & conserve natural resources – soil, water, minerals & waste[48]	The vast majority of development completions (90%) in 2021/22[49] were on former brownfield or previously developed land, with just 10% built on greenfield sites. The review of the CLP will recommend that priority is given to continuing to build on PDL where effectively located. Policy EM6 Redevelopment of Previously Developed Land provides mitigation to conserve natural resources indicating negligible effects for all five options. However, with the updating of polices to meet with new requirements, especially those for climate change & sustainable movement, there may be insufficient suitable PDL to meet with the higher quanta in Options 1 & 2 – indicating	**-**	**0?**	**-?**	**0**	**0**	**0**	**0**	**0**	**0**	**0**

[47] For example, please see https://www.darksky.org/light-pollution/human-health/
[48] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[49] https://www.coventry.gov.uk/downloads/file/39439/authority-monitoring-report-2021-22

	potential minor negative effects for Option 1 and for Option 2, although with some uncertainty at this stage. The best agricultural land must be conserved and effects of climate change may affect food security. Climate change, particularly incidences of hotter, drier, summers may exacerbate water supply issues; wetter and more flooding may overload wastewater systems. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The cumulative effects of the higher quanta of housing may incur minor negative effects but with some uncertainty at this stage. The recent Water Cycle Study Stage 1 (June 2024)[50] indicates that there is water capacity for the quanta in Options 3, 4 & 5 – with potential neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that neutral effects would be indicated. However, there may be some uncertainty associated with the higher quantum of housing in Option 1. **SA Suggestions at Regulation 18**: The effective use of land could consider whether an uplift in minimum housing density requirements might be possible where sufficient infrastructure is in place Are there sufficient allotments for any increasing need? Are there sufficient facilities that recycle and recover value from waste?					
11: To protect and enhance	It will be necessary to consider the new requirements from the Environment Act and including emerging metrics for calculating	**--?**	**-?**	**+?**	**+?**	**+?**

[50] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratfor on Avon DC, & Warwick DC

nature & biodiversity	biodiversity net gain (BNG)[51]. Unequal distribution, and access to, green infrastructure across the city can exacerbate health inequalities. There are priority areas that would benefit particularly from greening. Off-site areas for biodiversity net gain may be needed. Increased recreational pressures and water quality impacts (such as road run-off) as a result of new development can put pressure on GI and biodiversity. Climate change is likely to affect changes to habitats and species distribution. The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide further mitigation measures aiming for no major significant negative effects. However, the higher quanta of housing in Options 1& 2 will challenge mitigation possibilities for Coventry – even with new development being required to provide biodiversity net gain as land constraints will limit availability for provision of such biodiversity mitigation measures – and therefore, negative effects indicated. The HELAA (2024) studies have found that the quanta in Options 3, 4 & 5 could be accommodated and therefore, likely minor positive effects as all development will need to meet with 10% BNG. Overall, some uncertainties of significance of effects as depend upon locations, densities and any possibilities for sufficient offsite measures. **SA Suggestions at Regulation 18**: Need to consider any issues from transport & air quality for nitrogen deposition on nature sites Increasing density of housing in suitable locations could take the loading off land availability					

[51] Biodiversity Metric 4.0 (JP039) 2021 https://publications.naturalengland.org.uk/publication/6049804846366720

	Need to consider wider water network for quality, flows and any functionally linked watercourses with a longer term aspiration to restore connectivity by removing barriers					
12: To protect and enhance the historic environment, and its setting	Coventry has a range of unique historic assets that give the area its distinctive characters and cultural identity. Development pressures may continue to have potential negative effects on historic assets and their setting, especially through cumulative effects. As the population changes, local communities may change with different understandings of heritage value and importance. Mitigation of, and adaptation to, the effects of climate change are a particular challenge for heritage assets and their setting. The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. However, the quantum of housing in Options 1 & 2 is likely to have cumulative effects overall that will be difficult to mitigate due to the constraints within the City – therefore, minor negative effects but with some uncertainty at this stage. The lower quanta of housing in Options 3, 4 & 5 indicate that there is more capacity in the City to accommodate the change and with strong policies in place, likely effects will be reduced to neutral/negligible – but still some uncertainty as depends on precise details & location. The historic environment is closely interwoven with townscape & good design (SA No 13). It may also be noted that new development can resolve existing sustainability problems with the historic environment, for example, by removing extant unsightliness of the setting of an asset, improving accessibility, and enhancing the asset with its context/setting. Historic England recognises the need for urgent action & is committed to achieving net zero carbon; HE suggests that reusing	**-?**	**-?**	**0?**	**0?**	**0?**

	the current homes built before 1919 (about 20% in England) with appropriate energy improvement solutions is key to cutting carbon emissions[52]. **SA Suggestions at Regulation 18**: Increasing density of housing in suitable locations could take the loading off land availability & risks of negative effects for historic environment Reuse/refurbishment of older buildings is indicated as being more likely to progress to net zero carbon – but energy efficiency during operation may be an issue Are there areas of the city that have changed significantly with changing population such that the local value & importance has changed? Are there opportunities with the review to focus on protecting heritage assets at risk? Are there opportunities to resolve existing problems with the historic environment & enhancing access/context/setting? Consider proactive support for reuse of buildings pre 1919 with suitable energy improvements					
13: To protect and enhance the quality and character of townscapes & landscapes	It is important to promote good sustainable urban design and this should reflect the special characteristics and needs of different parts of the city. Good design should focus on people within the spaces, how they move, interact and socialise, and should ensure feelings of safety and security. Green and open spaces should be woven into the urban design, and consideration given to opportunities to enhance the blue infrastructure assets for Coventry. The Coventry Green Belt[53] remains an important mechanism to prevent urban sprawl, safeguard countryside, and preserve the setting and special character of historic towns – such as Coventry. The administrative boundary of Coventry is tightly defined with many parts of the existing urban area abutting the Green Belt. This was a significant issue during preparation of the current Plan & Coventry's exceptional	**--?**	**-?**	**+?**	**+?**	**+?**

[52] Historic England (March 2022) https://historicengland.org.uk/whats-new/features/climate-change/our-strategy/
[53] https://www.coventry.gov.uk/directory-record/45418/green-belt-land and see also: https://www.coventry.gov.uk/downloads/download/4073/evidence_base_-_coventry_and_warwickshire_joint_green_belt_review_2015

	circumstances were acknowledged. Policy GB1 Green Belt will be updated but the issue of constraints to high levels of new development remain and with particular adverse effects on Green Belt and the quality and character of town and countryside areas, including the closely woven historic environment. The recent technical update to the GB Study (July 2024)[54] has confirmed that Coventry's GB continues to serve GB purposes and it will continue to do so, noting that there remain some significant areas of PDL in the urban areas of Coventry. Climate change and population growth are exacerbating environmental issues in urban areas. The economic valuation of urban natural capital demonstrates multiple social, environmental and economic benefits and the importance of urban green and blue spaces and blue-green infrastructure[55]. Therefore, it is vital that space for green & blue infrastructure is retained & enhanced, including improvements to linkages & networks that will further benefit people & nature. Significant negative effects are likely for Options 1 & 2, and particularly for cumulative effects, as such high quanta of development are likely to compromise the possibilities for embedded & other mitigation measures in the design process. Mitigation measures, such as for design, location and offsetting, are likely to be effective for the lowest quanta of housing as capacity has been indicated in Options 3, 4 & 5. New development that is high quality, creative & proportional to the receiving townscape & local environment can have very positive effects, and also act as a catalyst for further enhancement of quality and human wellbeing to the built environment. Therefore, positive effects are likely for Options 3, 4 & 5 as it has been indicated by the HELAA studies that such housing numbers can be accommodated within the urban area.					

[54] Coventry city Council (July 2024) Green Belt Technical Update Study
[55] Environment Agency 2021 The State of the Environment: the urban environment https://www.gov.uk/government/publications/state-of-the-environment/the-state-of-the-environment-the-urban-environment

	Some uncertainty at this stage as significance will depend on location & extent of design mitigation possibilities. **SA Suggestions at Regulation 18**: Consider highest design & for reuse/refurbishment to avoid landtake & new build Consider higher densities in suitable, sustainable locations Require highest quality design principles & approach consistent with Coventry aspirations					

Appendix IIIb: Options for Residential Density	
1	Greenfield 30 dph[56]; outside ring road minimum 35 dph; inside ring road minimum 200 dph. Current adopted CLP Policy H9
2	As Option 1 but with >35 dph outside ring road – in certain locations
3	Greenfield 35 dph; Brownfield 45 dph; 125 dph in defined transition zone; 250 dph within City Centre boundary

		Options for Density		
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	**1. Greenfield 30 dph; Outside ring road min 35 dph; inside min 200dph**	**2. As Option 1 but Outside ring road >35 dph in certain locations**	**3. Greenfield 35 dph; Brownfield 45 dph; Transition Zone 125 dph; City Centre 250 dph**
1: To enable vibrant and inclusive communities	The current CLP approach set out in Policy H9 provides mitigation measures to avoid or minimise likely potential negative effects by defining standards for residential densities according to the characteristics and capacity of the different receiving environments within the Coventry area. The need to protect greenfield land from development pressures and recognise the more rural context is recognised with a lower density of 30 dph. The opportunities for effective use of previously developed land, particularly in a central urban context, is understood and policy allows for a minimum density of 200 dph inside the ring road, which defines a separation between inside and outside. A slightly higher density of 35 dph is permissible outside the ring road on non-greenfield land.	**0?**	**+**	**++**

[56] Dwellings per hectare

	The Council is investigating possibilities for increasing residential density outside the ring road in certain locations – to help meet with the increased need identified for housing development. It may be noted that there has been both praise and criticism for the ring road and its role in facilitating traffic movement, its complexity and being difficult to navigate, and forming a barrier between the city centre and its suburbs[57]. However, a series of poetry films[58] was used as part of Coventry's successful bid for status as UK city of Culture 2021. Thus, there are particular functions and characteristics associated with the ring road and these may influence nearby communities. High density places have been associated with sustainable outcomes but there is a risk of less interaction and building fewer relationships in such environments. However, for example, recent research[59] has investigated the delivery of award winning high density (250 dph) development in London and identified design factors that influence social interactions. Therefore, it is considered that there is evidence to support higher density residential developments, taking into account housing needs type and mix with local character and appropriate building forms such that there could be positive effects to enable vibrant and inclusive communities in certain locations outside the ring road. There could be synergistic and cumulative effects with other SA objectives, such as those for active travel (SA No 3), enabling provision of identified housing need (SA No 4), & promoting higher densities will better protect & conserve natural resources (SA No 10 soils). There is some uncertainty about whether the extant density arrangements will be able to accommodate the increased housing requirements. The density study[60] has identified development opportunities in the vicinity of the city centre boundary, thus defining a city centre transition zone where 125 dph is considered appropriate. This			

[57] For example, please see Beanland, Christopher (The Guardian, 4 March 2017) https://www.theguardian.com/cities/2017/mar/14/brutal-inspiration-why-poets-are-writing-about-coventrys-ring-road, and Jenny Scott (BBC News, 5 April 2014) Are these the worst ring roads in England? https://www.bbc.co.uk/news/uk-england-26036572 and (BBC News,16 March 2017) Coventry ring road inspires verse amid city of culture bid https://www.bbc.co.uk/news/av/uk-england-birmingham-39298399

[58] *Disappear Here* project funded with grants from Coventry City Council & Arts Council England

[59] Mellan H & M Short (UCL, 30 January 2023) Designing for social interaction in high density housing; a multiple case analysis of recently completed design-led developments in London https://www.frontiersin.org/articles/10.3389/frsc.2022.1043701/full

[60] Coventry City Council (July 2024) https://www.coventry.gov.uk/planning-policy/local-plan-review/3

	study has also found that there could be intensification of density within the city centre boundary due to its urban character and the proximity of city centre services and facilities. Capacity and viability studies have indicated that approx. 31,500 dwellings can be accommodated using this refinement of density thresholds that better consider the social & environmental characters and capacities – with major positive effects. **SA suggestions at Regulation 18**: Identify locations outside ring road where connectivity to the city centre could be optimised Consider recent experiences & research in England on the social implications of higher density development to inform potentially suitable dph & likely building design that would be appropriate for Coventry. Is there scope to consider 250 dph inside the ring road and as has been implemented through planning policy in London & where sustainable deliverables have been reported[61]?			
2: To provide accessible essential services and facilities for all residents	It is unclear whether the current approach to residential densities would actually be able to accommodate the identified housing needs. Capacity studies will inform the implications for provision of services & facilities - and mitigation measures will be proposed through updating of relevant policies (current CLP Policies AC1-7) such that there should be no significant adverse effects. If locations are identified outside the ring road where accessible essential services & facilities are available & with capacity, there will be negligible or neutral effects for Option 2. Some uncertainties as effects will depend on overall quantum of housing confirmed and locations. The refinement of densities to more specifically acknowledge the character & ability to accommodate different types of development as set out in Option 3 makes best use of accessibility to services & facilities with positive effects.	**0?**	**0?**	**+**

[61] For example, please see Lessons from Higher Density Development https://www.london.gov.uk/sites/default/files/project_2_3_lessons_from_higher_density_development.pdf and LSE (2020) Living in a Denser London https://www.lse.ac.uk/geography-and-environment/research/lse-london/documents/Reports/2020-LSE-Density-Report-digital.pdf

3: To improve health & promote active living	Overcrowding, poor housing conditions, and affordability problems have increased in recent years, as well as health inequalities[62]. It is unclear whether the current approach to residential densities would be able to accommodate the identified housing needs. However, capacity studies and mitigation measures provided through other policies, including in particular CLP Policy HW1 Health Impact Assessments (HIAs) that requires major development to ensure that it has no adverse effects on health and wellbeing, indicate that there will be no significant negative effects through the current approach to densities. Since the provision of good quality housing is known to have positive effects on health & wellbeing, then ensuring that needs can be met through appropriate increases in density in certain locations is likely to have positive effects. These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities & environment. **SA Suggestions**: Identify the relevant & appropriate densities for Coventry, seeking to reduce health inequalities by aligning housing with regard to areas of deprivation Ensure that proposed densities have taken into account building design requirements that create safety & help reduce crime; promote active living Higher densities may be suitable for the ageing population & design requirements will need to consider physical health & mental wellbeing to improve resilience Higher densities may be suitable for coliving	**0?**	**+?**	**+**
4: To provide decent and affordable housing for all	Overcrowding, poor housing conditions, and affordability problems have increased in recent years[63]. Taking into account the current approach to residential densities, it would not be possible to accommodate all the identified housing needs on brownfield (necessitating going to the Green Belt with associated likely negative	**+?**	**++**	**++**

[62] For example, see Tinson A & A Clair December 2020 Better Housing is crucial for our health & the Covid-19 recovery https://www.health.org.uk/publications/long-reads/better-housing-is-crucial-for-our-health-and-the-covid-19-recovery and The Marmot Review 10 Years On (February 2020) https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on

[63] For example, see Tinson A & A Clair December 2020 Better Housing is crucial for our health & the Covid-19 recovery https://www.health.org.uk/publications/long-reads/better-housing-is-crucial-for-our-health-and-the-covid-19-recovery and The Marmot Review 10 Years On (February 2020) https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on

	effects), but it would progress some provision such that some positive effects are indicated for Option 1, with uncertainty of significance. If ensuring that needs, including suitable mix & tenure for all identified groups, can be met through appropriate increases in density in certain locations, there are likely to be major positive effects for Option 2. These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities & environment.			
5: To support sustainable inclusive economic growth	Options for housing densities will not directly affect objectives for economic growth and therefore, at least neutral effects for SA No 5.	**0**	**0**	**0**
6: To help achieve the Council's ambition to reach net zero carbon emissions	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve dramatic reduction of carbon emissions. Therefore, at least neutral effects for SA No 6.	**0**	**0**	**0**
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. Therefore, at least neutral effects for SA No 7.	**0**	**0**	**0**
8: To reduce traffic & improve sustainable transport choices	The Coventry urban area is well connected with sustainable transport modes. Increasing housing densities in certain locations outside the ring road & where there is good accessibility & capacity to encourage sustainable and active travel will mitigate any potential negative effects. There may be possibilities to enhance sustainable travel through new development; proactive mechanisms to discourage car travel may be needed. The intensification of densities in the city centre & the transition zone could better discourage car travel & improve sustainable transport choices with positive effects, although some uncertainty as might depend on specific developments.	**0**	**0**	**+?**
9: To reduce air, noise & light pollution		**0**	**0**	**0**

	In the UK, air pollution has been recently reported as being the largest environmental risk to public health[64]. Reducing vehicle emissions will continue to improve air quality. Indoor air pollution is becoming an increasing proportion of the problem[65]. The Coventry Air Quality Action Plan[66] includes commitments to improve air quality that involve improvements for pedestrians and cyclists to and from the city centre – and this will improve sustainable connectivity through the ring road. For example, this might help identify those locations near the ring road where a higher residential density could be appropriate and help facilitate further connectivity between the city centre and suburban communities – with positive effects – and helping to resolve an existing sustainability problem. Noise pollution is an acknowledged issue for human health & wellbeing – physical & mental - (and also certain biodiversity see SA No 11), and particularly road traffic noise remains a major problem in Europe[67]. Significant health impacts are likely to be underestimated, and exposure to environmental noise does not affect everyone equally. As housing density increases, potential risks to health and wellbeing by noise from neighbouring activities and the wider environment (especially road traffic) is likely to increase. However, building design requirements[68] with acoustic separation & sound insulation can ensure that mitigation measures are implemented to acceptable levels/effects. Similarly, good quality design of buildings & their location can reduce the implications for light pollution on health & wellbeing. Light pollution disturbance can adversely affect health & wellbeing, including fatigue, insomnia stress & anxiety[69] (and also certain biodiversity – see SA No 11). Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan and these policies will be updated and improved in the review, including taking account of advances in building design & materials			

[64] OHID (updated Feb 2022) Air Pollution: applying All Our Health https://www.gov.uk/government/publications/air-pollution-applying-all-our-health/air-pollution-applying-all-our-health
[65] Chief Medical Officers' annual report 2022: air pollution https://www.sciencemediacentre.org/chief-medical-officers-annual-report-2022-air-pollution/
[66] https://letstalk.coventry.gov.uk/improvingaq Ring Road Junction 7
[67] EEA, 2020 https://www.eea.europa.eu/publications/environmental-noise-in-europe
[68] For example, please see https://www.bregroup.com/bretrust/wp-content/uploads/sites/12/2019/02/Acoustic-design-and-testing-Trust-report-online-version-1.pdf
[69] For example, please see https://www.darksky.org/light-pollution/human-health/

	resources uses such that mitigation measures could be ensured to enable promotion of appropriately increased residential densities in certain locations. Therefore, likely negligible effects for all three options. **SA Suggestions at Regulation 18:** Ensure that updating of environmental management policies considers highest design requirements to reduce potential air, noise & light pollution Continue to reduce the need to travel by vehicles & discourage car use			
10: To protect & conserve natural resources – soil, water, minerals & waste[70]	Some uncertainty of effectiveness of policy mitigation measures to protect natural resources from the scale of development; therefore potential minor negative effects for Option 1. Consideration of higher density residential developments will have positive effects for more effective use of land, particularly in the Coventry area that is so constrained, with possibilities for major significance but uncertain at this stage of assessment as depends on extent of quantum of housing, extent of densification & location. These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities & environment.	**-** **0**	**++?** **0**	**++** **0**
11: To protect and enhance nature & biodiversity	The scale of new development needed is likely to have strong pressures on green infrastructure (GI) & biodiversity with likely significant negative effects, even with the new requirements for biodiversity net gain. Consideration of higher density residential developments will have positive effects for more effective use of land, particularly in the Coventry area that is so constrained & with such importance for protecting spaces for GI & biodiversity. Possibilities for major significance but uncertain at this stage of assessment as depends on extent of quantum of housing, extent of densification & location.	**-?**	**++?**	**++**

[70] First cell refers to land/soil & water resources; second cell refers to minerals & waste

	These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities & environment.			
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment – regardless of residential densities.	**0**	**0**	**0**
13: To protect and enhance the quality and character of townscapes & landscapes	It is important to promote good sustainable urban design and this should reflect the special characteristics and needs of different parts of the city. The approach to residential densities already recognises the different characteristics & different possibilities for accommodating changes through increased development. High quality & proportionate new development can enhance the townscape & local character. By focusing the housing needs in certain locations with appropriate densification, pressures may be taken from other places; with high quality design, positive effects could be indicated but with uncertainty at this stage of assessment. These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities & environment. **SA Suggestions at Regulation 18**: Consider highest design possibilities & including for reuse/refurbishment to resolve existing sustainability/townscape issues	**0?**	**+?**	**+**

IIIc: Options for progressing Coventry's Climate Change Strategy[71]	
1	Planning policy requirements in line with national Future Homes Standard[72] & Future Buildings Standard[73] covering energy efficiency, ventilation and overheating through Building Regulations
2	Planning policy requirements that are over and above proposed Building Regulations to better progress Coventry's aspirational ambitions for addressing climate change effects

		Options for Climate Change	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	**1. In line with FHS & FBS**	**2. Over & above Building Regulations**
1: To enable vibrant and inclusive communities	Other factors are more likely to have potential effects on objectives for inclusive communities than requirements in line or above Building Regulations.	**0**	**0**

[71] Coventry's draft Climate Change Strategy 2023-2030 https://www.coventry.gov.uk/downloads/download/7434/coventry-s-draft-climate-change-strategy
[72] For example, please see: https://www.futurehomes.org.uk/delivery-at-scale
[73] https://www.gov.uk/government/consultations/the-future-buildings-standard

2: To provide accessible essential services and facilities for all residents	Other factors are more likely to have potential effects on objectives for accessibility to essential services & facilities than requirements in line or above Building Regulations.	**0**	**0**
3: To improve health & promote active living	An approach that progresses aspirations for adapting to climate change more promptly by requiring standards above national Building Regulations is likely to have positive effects for health & wellbeing by better reducing the risks to health. Climate change affects the social & environmental determinants of health - clean air, safe drinking water, sufficient food & secure shelter[74]. Reducing emissions of greenhouse gases through better transport, food and energy-use choices can result in improved health, particularly through reduced air pollution. There is some interpretation of data suggesting that achieving net zero emissions by 2050 *will not be enough to ensure a safe future for humanity*[75]. Any consequence of climate change that can bring physical ill health can also have mental health implications & climate change can negatively impact on mental health, including depression and anxiety. These factors may need more consideration in the future, but clear actions to mitigate climate change can positively influence mental health[76]. Aligning with Government requirements may be considered to have negligible but uncertain effects for health & wellbeing. However, by requiring standards over & above Building Regulations, aspirations for reducing carbon emissions will be achieved sooner & will better support the aspirations for Coventry City with regard to building resilience to climate change effects, including those for health. By making a clear proactive commitment, such action could influence both physical & mental health with potential major positive effects. As climate change effects are global, considerable uncertainties indicated.	**0?**	**++?**
SA No 4: To provide decent	There is a perceived concern from the construction industry in being able to meet national net zero carbon targets because of various issues – and most notably with the embedded carbon in materials[77].	**0?**	**?**

[74] WHO (October 2021) https://www.who.int/news-room/fact-sheets/detail/climate-change-and-health
[75] For example, please see CCAG as reported by IEMA (August 2021) https://www.iema.net/articles/net-zero-by-2050-too-little-too-late-scientists-warn
[76] UCL (July 2021) https://www.ucl.ac.uk/bartlett/news/2021/jul/climate-change-and-mental-health
[77] For example, please see https://www.environmentalleader.com/2022/02/uk-construction-industry-cites-these-barriers-to-net-zero-emissions/

and affordable housing for all	Therefore, there is a risk that requiring higher standards than national Building Regulations will pose greater challenges for new development design & building – and particularly construction – such that costs & viability for house building may be compromised with potential negative effects, especially in the shorter term. However, the development sector has embraced sustainability with the need to achieve net zero carbon & implementation of the circular economy with design for durability, reuse, remanufacturing, and recycling.[78] With commitment & creativity in design, higher standards may be more readily achievable; however, the effects on the delivery of the required housing is uncertain & unknown at this stage.		
5: To support sustainable inclusive economic growth	Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. It is unclear whether any requirement for higher standards through Building Regulations would have any significant effects on economic growth. It could be asserted that higher standards might equate to higher costs & thus limit growth. However, Government has advised that the transition to net zero carbon is the growth opportunity of the 21st century[79], and the recently published Net Zero Growth Plan (March, 2023)[80] continues to claim new opportunities to grow green jobs. Coventry has strong commitments for innovation, research & development in new technology such that higher standards could be a catalyst to promote progress in the green economy and support the city's aspirations. Some research has indicated that it is cheaper to reduce greenhouse gas emissions than it is to deal with climate change impacts[81] - and thus, this would support progressing higher standards sooner with some positive effects indicated for the economy.	**0?**	**+?**
6: To help achieve the		**0?**	**++?**

[78] For example, please see RIBA https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545 and BRE https://bregroup.com/products/breeam/breeam-solutions/breeam-circularity-and-resilience/
[79] https://www.gov.uk/government/news/net-zero-review-uk-could-do-more-to-reap-economic-benefits-of-green-growth
[80] DESNZ (March, 2023) https://www.gov.uk/government/publications/powering-up-britain
[81] https://www.ucl.ac.uk/news/2021/sep/economic-cost-climate-change-could-be-six-times-higher-previously-thought

Council's ambition to reach net zero carbon emissions	The Council recognises the climate crisis and is currently reviewing its Strategy[82]. This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure. Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019[83]. It has been reported that the construction industry needs to decarbonise more urgently[84] and building design needs to progress principles in the circular economy. There is some interpretation of data suggesting that achieving net zero emissions by 2050 "*will not be enough to ensure a safe future for humanity*"[85]. Implementation of planning policy requiring higher standards to reduce GHG emissions sooner than national requirements will have major positive effects towards helping the Council achieve its ambition for dramatic reduction of carbon emissions, as set out in the Coventry draft Climate Change Strategy but with uncertainties of significance at this stage.		
7: To build resilience to climate change	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK.[86] Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to health & wellbeing, the economy, and the environment. All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. Implementation of planning policy requiring higher standards, including reducing GHG emissions sooner than national requirements, will contribute to building resilience to climate change sooner with likely positive effects but some uncertainty of significance.	**0?**	**+?**
8: To reduce traffic & improve	Transport produced 24% of the UK's total emissions in 2020 & remains the largest emitting sector in the UK, with the majority of emissions from road vehicles[87].	**0**	**0**

[82] A Green Future for a Changing City(2022 – 2030) https://www.coventry.gov.uk/draftclimatechangestrategy
[83] UK Climate Change Committee https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Buildings.pdf
[84] For example, please see RAEng 2021 https://raeng.org.uk/news/construction-sector-must-move-further-and-faster-to-curb-carbon-emissions-say-engineers
[85] For example, please see CCAG as reported by IEMA (August 2021) https://www.iema.net/articles/net-zero-by-2050-too-little-too-late-scientists-warn
[86] For example, see https://earth.org/climate-change-in-the-uk/
[87] https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022

sustainable transport choices	Changes to Building Regulations will not affect this SA objective and therefore, neutral/not applicable effects.		
9: To reduce air, noise & light pollution	No direct effects likely – neutral/not applicable	**0**	**0**
10: To protect & conserve natural resources – soil, water, minerals & waste[88]	With climate change, temperate soils are forecast to experience a high degree of variability in moisture conditions; restoring lost carbon through conventional approaches may take decades; and food security is an increasing issue. Soil has been recognised as an essential national asset & government has indicated that managing soil carbon could form a part of net zero plans[89]. The review of the CLP will continue to build on previously developed land (PDL) where effectively located & thus contribute towards protecting agricultural land. Climate change, particularly incidences of hotter, drier, summers may exacerbate water supply issues; wetter weather and more flooding may overload wastewater systems. The cumulative effects of increased development on soil & water resources is uncertain, particularly in the shorter-medium term before the effects of net zero carbon actions are implemented & become effective. Therefore, uncertain negative effects for Option 1. Planning policy requirements that are over & above national building regulations requirements are likely to reduce carbon emissions earlier, thus mitigating negative effects on soils & water sooner, and thus indicating at least neutral effects – but uncertainty of significance at this stage of assessment. The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that at least neutral effects would be indicated for both options. Progressions with the circular economy, driven by the need to reduce carbon emissions & encouraged through higher standards as in Option 2, will conserve minerals & reduce/minimise/reuse waste with some potential further positive effects in the longer term but with uncertainty of significance.	**-?** **0**	**0?** **+?**

[88] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[89] UK Horizon scanning (April 2021) https://post.parliament.uk/soil-as-an-essential-national-asset/

11: To protect and enhance nature & biodiversity	The need for addressing biodiversity loss & climate change issues together is being increasingly recognised[90]. Climate change can contribute to biodiversity loss & biodiversity loss can make climate change and its effects worse. Government has recently reiterated that we cannot mitigate & adapt to climate change without Nature-Based Solutions[91]. It could be considered that meeting the proposed national standards for building regulations & reducing GHG emissions could approach negligible effects – but uncertainty as depends upon quantum of new development. All development will have to meet with new requirements for Biodiversity Net Gain & therefore, positive effects indicated for all options. It could be assumed that progressing more rigorous standards would reduce GHG emissions & sooner such that mitigation measures are earlier & more effective such that there could be some positive effects for nature & biodiversity – but uncertainty as depends upon quantum of new development & extent of associated biodiversity gain.	**+?**	**++?**
12: To protect and enhance the historic environment, and its setting	Historic England recognises the need for urgent action & is committed to achieving net zero carbon; HE suggests that reusing the current homes built before 1919 (about 20% in England) with appropriate energy improvement solutions is key to cutting carbon emissions[92]. The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. It could be assumed that progressing more rigorous standards would reduce GHG emissions & sooner such that mitigation measures are earlier & more effective such that there could be less risk of negative effects on the historic environment – but uncertainty as depends upon extent of development & location.	**0**	**+?**
13: To protect and enhance the	The national design guide (2019)[93] sets out the characteristics of well-designed places & includes consideration of minimising carbon emissions. Circular economy principles in building design[94] will	**0**	**0?**

[90] For example, please see UK Parliament Post (Feb 2020) https://researchbriefings.files.parliament.uk/documents/POST-PN-0617/POST-PN-0617.pdf and NE (April 2020) Climate Change Adaptation Manual (NE751) https://publications.naturalengland.org.uk/publication/5679197848862720
[91] Defra (January 2023) Environmental Improvement Plan 2023 https://www.gov.uk/government/publications/environmental-improvement-plan
[92] Historic England (March 2022) https://historicengland.org.uk/whats-new/features/climate-change/our-strategy/
[93] https://www.gov.uk/government/publications/national-design-guide
[94] For example, please see RIBA https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545 and BRE https://bregroup.com/products/breeam/breeam-solutions/breeam-circularity-and-resilience/

quality and character of townscapes & landscapes	contribute towards mitigating effects of climate change. It is also acknowledged that new proportional & high quality development can enhance the townscape. The current CLP includes policies to protect townscapes/landscapes, especially Policy DE1 Ensuring High Quality Design, including consideration of climate change. These will be updated in the CLP review, and therefore, likely negligible effects with regard to the proposed changes to Building Regulations. There may be challenges to design & construction, particularly in the shorter term, if requirements over & above such standards are proposed and thus with some uncertainty of significance.		

IIId: Options for Nature & Biodiversity	
1	Planning policy requirements in line with national requirements & standards, including 10% Biodiversity Net Gain (BNG)[95], and Green Infrastructure (GI[96]) standards[97]
2	Planning policy requirements that are over and above national requirements for BNG & GI standards

The recent Environmental Improvement Plan (January, 2023)[98] for England includes a commitment that the public should be able to access green space or water, such as woodlands, wetlands, parks and rivers, within a 15-minute walk from their home. The Green Infrastructure Framework (GIF, Feb 2023)[99] provides a structure to analyse where greenspace in urban environments is needed most. It aims to support equitable access to greenspace across England. The framework integrates green infrastructure tools, principles, standards and design guidance. It is structured by five key standards:

- Urban Nature Recovery Standard – including trees & wildflowers to increase carbon capture, prevent flooding, & reduce temperatures during heatwaves
- Urban Greening Factor (UGF) – approximately 40% of residential developments to have green & blue spaces, green roofs or green walls
- Urban Tree Canopy Cover Standard – increase tree canopy cover in urban environments
- Accessible Greenspace Standards - promote access to good quality green and blue space within 15 minutes' walk from home
- Green Infrastructure Strategy - delivery plans to support creation and enhancement of new and existing greenspace

[95] Environment Act 2021, and for example, please see https://consult.defra.gov.uk/defra-net-gain-consultation-team/consultation-on-biodiversity-net-gain-regulations/
[96] Includes both green and blue (water-related) infrastructure
[97] https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx
[98] Defra (January 2023) Environmental Improvement Plan 2023 https://www.gov.uk/government/publications/environmental-improvement-plan
[99] Natural England, Feb 2023 https://www.gov.uk/government/news/natural-england-unveils-new-green-infrastructure-framework

		Options for Nature & Biodiversity	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	**1. In line with national requirements & standards for BNG & GI**	**2. Over & above national requirements for BNG & GI**
1: To enable vibrant and inclusive communities	The provision & accessibility of GI can encourage safe social connectivity & help reduce social isolation. It could be considered that provision of GI in line with proposed national standards would meet with objectives & that higher standards would not necessarily significantly affect inclusivity. There are other factors, including for building design and locations, that are more likely to have effects on vibrant and inclusive neighbourhoods. Therefore, negligible effects for both options.	**0**	**0**
2: To provide accessible essential services and facilities for all residents	It is likely that implementation of the proposed national standards for GI will increase provision of, and accessibility to, green infrastructure – with positive effects. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision & accessibility of GI with further positive effects – that are likely to be synergistic & cumulative, particularly in the longer term.	**+**	**++**
3: To improve health & promote active living	It is likely that implementation of the proposed national standards for GI will increase provision of, and accessibility to, green infrastructure – with positive effects for health & wellbeing, both physical & mental. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision & accessibility of GI with further positive effects for health & wellbeing – that are likely to be synergistic & cumulative, particularly in the longer term.	**+**	**++**

	Coventry has been a Marmot City[100] since 2013 & there has been progress in outcomes across health & society. The Marmot Review[101] in 2020 on health equity in England highlighted that the health gap has grown between wealthy & deprived areas, people can expect to spend more of their lives in poor health, improvements to life expectancy have stalled, and that place matters. Enhancing GI is only one factor that contributes to improving health & wellbeing. However, a requirement to meet standards for GI over & above national proposals would demonstrate further strong commitment to Marmot principles & support for the multisectoral & partnership approach in the city. The visible greening of the urban areas could further encourage people in active living with positive effects for health & wellbeing. **SA Suggestions**: Align opportunities for enhancing GI network in most deprived areas & where health inequity could be most reduced		
4: To provide decent and affordable housing for all	Provision of, and accessibility to, enhanced GI will improve the overall quality of residential development, supporting positive effects from housing provision for all. It is vital that the appropriate mix & tenure of housing, suitable for different housing needs of different people & at different times of their lives, is planned according to identified needs. Nonetheless, it is important to retain sufficient space to accommodate GI & in locations where it may better support nature & people. It is unclear at this stage what quantum of housing could be accommodated together with aspirational GI for nature, people & climate change. This is a particular challenge for Coventry with its boundary & other constraints. It is difficult to predict the effects of increasing requirements for GI above national standards on housing as it depends upon quantum & location of development with uncertainties at this stage of assessment.	**+?**	**+?**
5: To support sustainable inclusive economic growth	Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. The economic valuation of urban natural capital demonstrates multiple social, environmental and economic benefits and the importance of urban green and blue spaces and blue-green	**0?**	**0?**

[100] https://www.coventry.gov.uk/policy-1/coventry-marmot-city
[101] https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on

	infrastructure[102]. Whilst improvements to GI will enhance the local environment for residents, workers & visitors, it is unclear how this will directly affect sustainable economic objectives and therefore, uncertainties.		
6: To help achieve the Council's ambition to reach net zero carbon emissions	The GI Standards aim to improve resilience to & mitigation of climate change, including increasing carbon capture, and with positive effects towards reaching dramatic reduction of carbon emissions, as set out in Coventry's draft Climate Change Strategy. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision & accessibility of GI with further positive effects for reducing GHG emissions – that are likely to be synergistic & cumulative, particularly in the longer term. The more extensive greening of the urban environment would visually demonstrate a strong commitment to GI & progressing towards a dramatic reduction of carbon emissions that may further engage people in helping to achieve the Council's ambition. Uncertainties for significance at this stage of assessment.	**+**	**++?**
7: To build resilience to climate change	The GI Standards aim to improve resilience to & mitigation of climate change, including preventing flooding, and reducing temperatures during heatwaves, and with positive effects towards building resilience to climate change. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision & accessibility of GI with further positive effects for resilience – that are likely to be synergistic & cumulative, particularly in the longer term. The more extensive greening of the urban environment would visually demonstrate a strong commitment to GI & progressing towards a dramatic reduction of carbon emissions that may further engage people in helping to achieve the Council's ambition. Uncertainties for significance at this stage of assessment.	**+**	**++?**
8: To reduce traffic & improve sustainable transport choices	Improving the sustainable transport network for cycling & walking can be integrated with the GI network for mutual benefits for nature & people. It is not clear how differences in GI standards will directly affect sustainable transport objectives – likely negligible effects for both options.	**0**	**0**
9: To reduce air, noise & light pollution	Good quality GI has an important role to play in improving air quality in urban areas, including reducing particulate matter – and thus improving health/wellbeing – with positive effects. GI can	**+**	**++?**

[102] Environment Agency 2021 The State of the Environment: the urban environment https://www.gov.uk/government/publications/state-of-the-environment/the-state-of-the-environment-the-urban-environment

	reduce noise pollution – trees can act as sound barriers as they can either absorb or deflect noise (or both) & vegetation, including green roofs & wall systems act as sound insulation. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision & accessibility of GI with further positive effects for reducing air & noise pollution – that are likely to be synergistic & cumulative, particularly in the longer term. Uncertainties for significance at this stage of assessment.		
10: To protect & conserve natural resources – soil, water, minerals & waste[103]	Provision of GI – both green & blue – will contribute to protecting & conserving the natural resources of soils & water with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection of such natural resources but there is uncertainty for the significance of the further positive effects. It is not clear how differences in GI standards will directly affect sustainability objectives for waste & minerals – likely negligible effects for both options.	**+** **0**	**++ ?** **0**
11: To protect and enhance nature & biodiversity	Provision of GI – both green & blue – will contribute to protecting & enhancing nature & biodiversity with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection & enhancement of nature & biodiversity but there is uncertainty for the significance of the further positive effects.	**+**	**++?**
12: To protect and enhance the historic environment, and its setting	It is not clear how differences in GI standards will directly affect sustainability objectives for the historic environment, although for example, improvements in air quality through greening will reduce polluting effects on historic buildings – likely negligible effects for both options.	**0**	**0**
13: To protect and enhance the quality and character of townscapes & landscapes	Provision of GI – both green & blue – will contribute to protecting & enhancing the quality & character of townscapes & landscapes with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection & enhancement of townscapes & landscapes but there is uncertainty for the significance of the further positive effects.	**+**	**++?**

[103] First cell refers to land/soil & water resources; second cell refers to minerals & waste

IIIe: Options for Development in the Green Belt	
1	Potential for development within the Green Belt
2	No potential development within the Green Belt

		Options for Green Belt	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	**1. Development in Green Belt**	**2. No Development within the Green Belt**
1: To enable vibrant and inclusive communities	Other factors are more likely to have potential effects on objectives for inclusive communities than locations in or out of the Green Belt. However, urban sprawl & encroachment of the countryside can affect the vibrancy of communities & some uncertainty of effects for Option 1; and development in the GB could have the unintended consequences of producing isolated communities[104].	**-?**	**0**
2: To provide accessible essential services and facilities for all residents	Other factors are more likely to have potential effects on objectives for accessibility to essential services & facilities than locations in or out of the Green Belt.	**0**	**0**

[104] https://www.theguardian.com/society/article/2024/aug/02/labours-grey-belt-plans-could-result-in-isolated-communities-warns-leading-architect

3: To improve health & promote active living	Provision of good quality housing will have positive effects on health & wellbeing regardless of whether it is in or out of the Green Belt. Protecting the openness of GB land, including for nature & recreation, is likely to have major positive effects for health & wellbeing with Option 2, although some uncertainty of the precise significance at this stage of assessment. Urban sprawl & encroachment of the countryside can affect residents' wellbeing & such development can evoke strong feelings – minor positive effects for Option 1 with potential for some uncertainty of significance as depends on locational specificity.	**+?**	**++?**
SA No 4: To provide decent and affordable housing for all	The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (NPPF). Protecting the Green Belt is useful for urban regeneration as it encourages the use of brownfield rather than greenfield land, and is an efficient use of land. The GB prevents urban sprawl – limiting air pollution, loss of open/green spaces, & pressures on services/facilities; and preserves the countryside for nature, farming, recreation & related open uses, including protection of historic settlements & landscapes. In some areas for GB, it may be asserted that as urban areas become restricted to new housing, there is a lack of developable land with concomitant increases in house prices[105], and it can also lead to leapfrog development on the outer edge of the GB; consideration of the GB can be controversial[106]. In some areas, the actual land designated by such planning policy may not have any ecological value & has not been based on its natural beauty. These poor quality GB areas have been identified as grey belt areas by the Labour Government & likely definitions are set out in the proposed revisions to the NPPF (July 2024)[107]. However, the Coventry Local Plan to 2041 will be submitted under the current NPPF which does not mention any requirements regarding grey belt land. Coventry has two distinctive types of Green Belt – the open countryside of Ancient Arden to the west; and GB corridors of open land tracts that extend through the built-up area of the city, to and from the countryside beyond. Of greatest significance is the wider GB that encircles the city, helping prevent urban sprawl. Existing LP Policy GB1 Green Belt & Local Green Space provides detailed	**0**	**0**

[105] https://www.ons.gov.uk/economy/environmentalaccounts/articles/urbangreenspacesraisenearbyhousepricesbyanaverageof2500/2019-10-14
[106] For example, please see https://www.cbre.co.uk/insights/articles/should-we-build-more-homes-on-the-green-belt
https://www.centreforcities.org/reader/benefits-challenges-green-belt/
https://theweek.com/arts-life/property/960970/pros-and-cons-of-building-on-the-green-belt
https://www.theguardian.com/society/2023/nov/24/building-on-the-green-belt-is-no-solution-to-the-housing-crisis
https://www.cpre.org.uk/explainer/all-you-need-to-know-about-the-green-belt/
[107] https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system#chapter-5--brownfield-grey-belt-and-the-green-belt

	explanation of the difficulties facing the Council, particularly with such a tight administrative boundary. For the adopted 2017 LP, the Council considered the Joint Green Belt Review[108], together with other evidence to explore Coventry's exceptional circumstances regarding development pressures and release of some suitable land from the GB. Thus, at that time, the Council investigated any opportunities for GB land that would not be urban sprawl, retaining openness by avoiding/minimising any negative effects & optimising the positive effects for development land. Coventry City Council has updated its technical review[109] of the GB and this has confirmed that the limited remaining GB land in the Coventry area continues to serve GB purposes. LP Policies GB1 Green Belt and GB2 Safeguarded Land in the Green Belt will be updated for the CLPR. Capacity (HELAA 2024)[110] & the viability study have determined that identified needs of approx. 31,500 new dwellings can be accommodated within the urban areas and without needing to consider residential locations in the Green Belt. Therefore, neutral effects for both options.		
5: To support sustainable inclusive economic growth	Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. The Council has identified a shortfall of employment sites within its own administrative area, against its identified quantum of local need. A particular site in the Green Belt (Site North of A45 & West of Brick Hill Lane) is being promoted for employment purposes. Therefore, potential minor positive effects for limited employment land in the GB but with some uncertainty at this stage as impact significance & mitigation possibilities depend upon locational & development details. Minor negative effects for the economy if the Council cannot meet its employment land identified need through avoiding suitable land in the GB – some uncertainty of significance as depends on development type & jobs details.	**+?**	**-?**
6: To help achieve the Council's ambition to reach net zero carbon emissions	The Council recognises the climate crisis and is currently reviewing its Strategy[111]. This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure.	**0**	**0**

[108] Coventry & Warwickshire Joint Green Belt Review (2015)
[109] Coventry City Council (July 2024) Green Belt Technical Update Study
[110] Coventry City Council (2023) Housing & Economic Land Availability Assessment https://www.coventry.gov.uk/planning-policy/local-plan-review/3
[111] A Green Future for a Changing City(2022 – 2030) https://www.coventry.gov.uk/draftclimatechangestrategy

	Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019[112]. It has been reported that the construction industry needs to decarbonise more urgently[113] and building design needs to progress principles in the circular economy. All development will have to reduce GHG emissions in line with updated planning policy – regardless of whether in or out of the GB – therefore, neutral effects.		
7: To build resilience to climate change	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK.[114] Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to health & wellbeing, the economy, and the environment. All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change – regardless of whether in or out of the GB – therefore, neutral effects.	**0**	**0**
8: To reduce traffic & improve sustainable transport choices	Transport produced 24% of the UK's total emissions in 2020 & remains the largest emitting sector in the UK, with the majority of emissions from road vehicles[115]. Development in the Green Belt might not reduce traffic, whilst development focused on PDL might improve sustainable transport choices and therefore, neutral effects for Option 1 and minor positive effects for Option 2 – but uncertainty at this stage, as depends upon proposals and locations.	**0?**	**+?**
9: To reduce air, noise & light pollution	Development in or out of the Green Belt will not affect this SA objective and no direct effects likely – neutral/not applicable	**0**	**0**
10: To protect & conserve natural resources – soil, water, minerals & waste[116]	The review of the CLP will continue to build on previously developed land (PDL) where effectively located & thus contribute towards protecting agricultural land – and Green Belt land – with positive effects for Option 2, including by encouraging *the recycling of derelict and other urban land* & thus, supporting one of the five purposes of GB land. The recent Water Cycle Study Stage 1 (June 2024)[117] indicates that there is water capacity for the preferred residential quantum and therefore, likely neutral effects with regard to GB land for both options.	**0** **0**	**+** **0**

[112] UK Climate Change Committee https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Buildings.pdf
[113] For example, please see RAEng 2021 https://raeng.org.uk/news/construction-sector-must-move-further-and-faster-to-curb-carbon-emissions-say-engineers
[114] For example, see https://earth.org/climate-change-in-the-uk/
[115] https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022
[116] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[117] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratfor on Avon DC, & Warwick DC

	The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that at least neutral effects would be indicated for both options.		
11: To protect and enhance nature & biodiversity	Grey belt land[118] may be visually unsatisfactory but could be supporting valuable biodiversity. The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These will be updated & should provide sufficient mitigation such that effects will be at least neutral with regard to GB land – all development will be required to meet with new requirements for Biodiversity Net Gain indicating positive effects for both options but some uncertainty of significance at this stage.	**+?**	**+?**
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment – with neutral effects for GB land. However, avoiding development in the Green Belt supports one of the 5 purposes – to preserve the setting & special character of historic towns – therefore, potential positive effects for Option 2 and the historic environment; uncertainty at this stage as depends upon location.	**0**	**+?**
13: To protect and enhance the quality and character of townscapes & landscapes	The NPPF[119] sets out the importance of Green Belts. *The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Green Belt serves five purposes:* *a) to check the unrestricted sprawl of large built-up areas;* *(b) to prevent neighbouring towns merging into one another;* *(c) to assist in safeguarding the countryside from encroachment;* *(d) to preserve the setting and special character of historic towns; and* *(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land*.	**--**	**++**

[118] Proposed definition in NPPF consultation (July 2024) "*ugly, disused land' including scrubland*"
[119] https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land

	The new Labour Government has set out plans for delivering homes in the Green Belt[120] and confirmed through recent proposals for reform of the NPPF (July 2024)[121]. The consultation draft advises that "*We want this approach to protect land which makes a strong contribution to any Green Belt purposes, while allowing authorities to consider a range of Green Belt land based on its merits for potential development*". However, the review of the CLP to 2041 will be submitted under the current NPPF which does not make any requirements in respect of grey belt land. It is for LPAs to define and maintain GB land in their local areas. Coventry has two distinctive types of Green Belt – the open countryside of Ancient Arden to the west and north west; and GB corridors of open land tracts that extend through the built-up area of the city, to and from the countryside beyond. Of greatest significance is the wider GB that encircles the city, helping prevent urban sprawl and coalescence. The adopted Coventry LP was informed by a sub-regional GB study (2015), and since the CLP removed 16% of GB to accommodate identified development needs at that time, there is now limited GB land in the CLP area. Existing LP Policy GB1 Green Belt & Local Green Space provides detailed explanation of the difficulties facing the Council, particularly with such a tight administrative boundary. Coventry City Council has undertaken a technical update[122] to the original GB Review & using the same methods. The study has concluded that any potential releases of land from the GB for built development will have visual or other impact, and that the GB areas continue to serve GB purposes. The study recommends the areas to remain as GB in their entirety; also in respect of safeguarded land in the GB with a note that further technical study is required regarding the extant allocations set out in the Warwick DC LP and the proposed Warwickshire JLP. LP Policies GB1 Green Belt and GB2 Safeguarded Land in the Green Belt will be updated for the CLPR. Since there is strong updated evidence that the limited GB in the Coventry area continues to serve GB purposes (and thus is not likely to be defined as greybelt land), it is considered that any proposals for development in the GB could have major negative effects. Protecting the limited GB in the Coventry area is likely to have major positive effects for GB purposes & the SA objectives.		

[120] https://labour.org.uk/updates/stories/labours-housing-plan-how-well-protect-our-natural-spaces-and-free-up-grey-belt-land-for-building/
[121] https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/
[122] Coventry City Council (July 2024) Green Belt Technical Update Study

IIIf: Options for Quantum of General Industrial Employment Land	
1	147.6 ha general industrial (excluding strategic B8) – HEDNA (2022)
2	60 ha general industrial calculated as quantum that can be accommodated
3	60 ha plus an additional 11.81 ha being promoted & located in the Green Belt (Site North of A45 & West of Brick Hill Lane)

		Options for Quantum of General Industrial Employment Land		
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	**1. 147.6 hectares**	**2. 60 hectares calculated that can be accommodated**	**3. 60 ha + 11.81 ha located in Green Belt**
1: To enable vibrant and inclusive communities	Other factors are more likely to have potential significant effects on objectives for inclusive communities than the quantum of employment land. However, provision of sufficient employment land to support the economy and a diversity of jobs will overall contribute to vibrant & inclusive communities. The HEDNA (Nov 2022)[123] considered employment land requirements across Coventry and Warwickshire looking to 2041 and 2050. For Coventry, the employment land needs were calculated to be 147.6 general industrial – and please see SA No 5 Economic	**-?**	**+?**	**+**

[123] Housing & Economic Development Needs Assessment (HEDNA, November 2022) Iceni Projects Ltd on behalf of Coventry & Warwickshire Local Authorities https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna

	Growth for more details. Recent studies (ELR, May 2024)[124] have considered the changes & trends in the employment market since the current Local Plan was adopted, and investigated suitability of existing employment sites for continued use. Provision of the identified need of 147.6 ha general industrial employment land in Option 1 would suggest that the role of employment contributing to vibrant communities would be satisfied with positive effects. However, capacity studies (HELAA 2024)[125] & review studies (ELR 2024) indicate that this quantum of land may not be possible within the constrained nature of the Coventry area & therefore, negative effects but uncertainty of significance. Uncertainty of positive effects is indicated with Option 2 that is less than identified need but has been found that can be accommodated. Option 3 includes one additional site that is in the Green Belt. If potential negative effects on GB purposes can be mitigated, then with this additional site the quantum approaches the identified need and can be accommodated with more certainty of positive effects.			
2: To provide accessible essential services and facilities for all residents	Other factors are more likely to have potential effects on objectives for accessibility to essential services & facilities than the quantum of employment land – neutral effects for all three options.	**0**	**0**	**0**
3: To improve health & promote active living	The relationship between fair employment, good work and health has been recognised for many years. Whilst employment rates have increased nationally since 2010, there has been an increase in poor quality work, including part-time, insecure employment (Marmot Review 10 years on, 2020)[126]. Since 2010 there have been profound shifts in many aspects of the labour market and employment practices in England. Rates of unemployment have decreased but increases in employment have often been in low-paid, unskilled, self-employed, short-term or zero hours contract jobs –which have seen a steady growth. Rates of pay have not increased and, notably, more people in poverty are now in work than out of work. The rise of automation in the labour market also has	**-?**	**+?**	**+**

[124] DLP Planning Ltd for Coventry City Council (May 2024) Coventry Employment Land Review
[125] Coventry Housing and Economic Land Availability Assessment (HELAA, 2024) https://www.coventry.gov.uk/planning-policy/local-plan-review/3
[126] The Health Foundation (Feb 2020) Health Equity in England: The Marmot Review 10 Years On https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on

	implications for health inequalities. Unemployment and poor quality work are major drivers of inequalities in physical and mental health. Provision of the identified need of 147.6 ha general industrial employment land in Option 1 would suggest that employment needs would be met with concomitant positive effects for health. However, capacity & review studies indicate that this quantum of land may not be possible within the constrained nature of the Coventry area & therefore, some negative effects but uncertainty of significance. Uncertainty of positive effects is indicated with Option 2 that is less than identified need but has been found that can be accommodated. Option 3 includes one additional site that is in the Green Belt. If potential negative effects on GB purposes can be mitigated, then with this additional site the quantum approaches the identified need and can be accommodated with more certainty of effects.			
SA No 4: To provide decent and affordable housing for all	The provision of good quality new homes will support the ambitions for sustainable economic growth & neutral effects suggested for Options 2 & 3. Studies have indicated that Option 1 cannot be accommodated. There is a risk that continuing to progress this option could compromise the availability of certain land for residential/mixed-use development & other uses, and limit the opportunities for ensuring that general industrial land is located in the most sustainable locations.	**-?**	**0**	**0**
5: To support sustainable inclusive economic growth	Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. Coventry has seen strong economic growth over the past few years and is recognised as a national centre for a number of growing business sectors, including advanced manufacturing and engineering; energy and low carbon; connected autonomous vehicles; business, professional & financial services; digital, creative, and gaming. These have all resulted in the creation of high-quality jobs for in growth sectors. However, there are a number of challenges, Coventry's economic growth and prosperity lags behind the England average and the city has fewer people in work compared to both regional and national figures[127].	**+?**	**++?**	**++**

[127] One Coventry Plan 2022-2030 https://www.coventry.gov.uk/downloads/download/7162/one-coventry-plan-2022-2030

	It is notable that many of Coventry's private sector businesses are small or micro-businesses & the Council has an important priority to support SMEs[128]. Further priorities for creating the infrastructure to enable sustainable economic growth include innovating with multi-user developments (such as Friargate & City Centre South), and enabling the city to be cleaner & greener with GI & renewable energy. With regard to employment land needs, the HEDNA (Nov 2022)[129] concluded that whilst the demand for B8 land use (storage/warehousing)[130] is strong, there is a need for separate allocations for B1c/B2 (general industrial) where land is delineated from sites going for B8 in order to support the manufacturing sector. Taking into account various sub-regional factors & an adjustment for flexibility, the HEDNA concludes on 147.6 general industrial land need for the Coventry LP area to 2041. Provision of the identified need of 147.6 ha general industrial employment land in Option 1 would suggest that the contribution to sustainable economic growth objectives would be achieved with positive effects. However, capacity studies (HELAA 2024) & land review studies (ELR 2024)[131] indicate that this quantum of land may not be possible within the constrained nature of the Coventry area & therefore, uncertainty of significance. Some uncertainty of positive effects is indicated with Option 2 that is less than identified need but has been found that can be accommodated. Option 3 includes one additional site that is in the Green Belt. If potential negative effects on GB purposes can be mitigated, then with this additional site the quantum approaches the identified need and can be accommodated with more certainty of effects. Existing CLP Policies JE1-JE7 on employment will be updated & revised, including a new policy that addresses R&D employment, differentiating this from industrial & storage/distribution development. The Council is also reassessing whether the existing employment allocations are still suitable & deliverable & align with the overall strategy.			

[128] Coventry City Council Economic Development Strategy 2022-2027 https://www.coventry.gov.uk/council-democracy/economic-development-strategy-2022-2027/3

[129] Housing & Economic Development Needs Assessment (HEDNA, November 2022) Iceni Projects Ltd on behalf of Coventry & Warwickshire Local Authorities

[130] Discussions are ongoing on how to meet the separately identified strategic B8 needs to serve the wider Coventry & Warwickshire functional economic market area – and this is not considered further within this SA of the Coventry Local Plan Review

[131]

	There may be other opportunities with employment sites to enhance objectives for GI, clean energy & net zero carbon that would extend positive effects beyond SA No 5 - depends on locational & industrial specificities. **SA Suggestions**: ▪ Is there scope to increase density of job numbers through creative building design that optimises footprinting? ▪ Maximising use of green roofs & other GI to encourage greening of sustainable economic development ▪ Maximising use of renewable energy modes – to include neighbourhood provision?			
6: To help achieve the Council's ambition to reach net zero carbon emissions	The Council recognises the climate crisis and is currently reviewing its Strategy[132]. This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure. Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019[133]. It has been reported that the construction industry needs to decarbonise more urgently[134] and building design needs to progress principles in the circular economy. A major element of the review of the CLP is to address the Council's ambitions to reach net zero carbon emissions, including updates to Policy EM1 and replacement of Policies EM2 & EM3 with EM11-EM14 incorporating building standard requirements for different typologies. All development will be required to meet with new policy – therefore, neutral effects for all three options.	**0**	**0**	**0**
	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK.[135] Therefore, it is vital to	**0**	**0**	**0**

[132] A Green Future for a Changing City(2022 – 2030) https://www.coventry.gov.uk/draftclimatechangestrategy
[133] UK Climate Change Committee https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Buildings.pdf
[134] For example, please see RAEng 2021 https://raeng.org.uk/news/construction-sector-must-move-further-and-faster-to-curb-carbon-emissions-say-engineers
[135] For example, see https://earth.org/climate-change-in-the-uk/

7: To build resilience to climate change	build resilience, including reducing risks from overheating, flooding and the resultant detriment to health & wellbeing, the economy, and the environment. A major element of the review of the CLP is to build resilience to climate change effects and all development will be required to meet with new and updated policies – therefore, neutral effects for all three options.			
8: To reduce traffic & improve sustainable transport choices	Transport produced 24% of the UK's total emissions in 2020 & remains the largest emitting sector in the UK, with the majority of emissions from road vehicles[136]. The Council will seek to select employment development land that best supports objectives for sustainable transport – and it is indicated that Options 2 & 3 could be accommodated; Option 1 cannot be accomodated. CLP Policies AC1 Accessible Transport Network and AC2-AC6 will be updated to better support sustainable movement & active travel. Therefore, neutral effects for all three options.	**0**	**0**	**0**
9: To reduce air, noise & light pollution	No direct effects likely – neutral/not applicable. All development will be required to meet with EM Policies.	**0**	**0**	**0**
10: To protect & conserve natural resources – soil, water, minerals & waste[137]	With climate change, temperate soils are forecast to experience a high degree of variability in moisture conditions; restoring lost carbon through conventional approaches may take decades; and food security is an increasing issue. Soil has been recognised as an essential national asset & government has indicated that managing soil carbon could form a part of net zero plans[138]. The review of the CLP will continue to build on previously developed land (PDL) where effectively located & thus contribute towards protecting agricultural land. Many of the existing sites are on PDL indicating positive effects for conserving soil but Option 1 does not use land as effectively as Options 2 & 3 such that the positive/negative effects indicate overall neutral. Some uncertainty of effects for Options 1 & 2 whilst for Option 3 that has most effectively used land, positive effects are more certain.	**0?** **0**	**+?** **0**	**+** **0**

[136] https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022
[137] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[138] UK Horizon scanning (April 2021) https://post.parliament.uk/soil-as-an-essential-national-asset/

	CLP Policies EM1-EM6 will be updated & thus provide sufficient mitigation for all development. The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that at least neutral effects would be indicated for all three options. Progressions with the circular economy, driven by the need to reduce carbon emissions & encouraged through higher standards, will conserve minerals & reduce/minimise/reuse waste with some potential further positive effects in the longer term but with uncertainty of significance.			
11: To protect and enhance nature & biodiversity	It will be necessary to consider the new requirements from the Environment Act and including emerging metrics for calculating biodiversity net gain[139]. Unequal distribution, and access to, green infrastructure across the city can exacerbate health inequalities. There are priority areas that would benefit particularly from greening. Off-site areas for biodiversity net gain may be needed. Increased recreational pressures and water quality impacts (such as road run-off) as a result of new development can put pressure on GI and biodiversity. Climate change is likely to affect changes to habitats and species distribution. The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide further mitigation measures such that there will be no major significant negative effects. All development will have to meet with new requirements for Biodiversity Net Gain & therefore, positive effects indicated for all options but some uncertainty of significance at this stage. The Council will continue to allocate employment development sites to PDL & new development can create opportunities for enhancing GI and biodiversity with potential positive effects but uncertainty at this stage as depends upon locational specificity.	**+?**	**+?**	**+?**

[139] Biodiversity Metric 4.0 (JP039) 2021 https://publications.naturalengland.org.uk/publication/6049804846366720

12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide sufficient mitigation measures to avoid significant negative effects on the historic environment – but some uncertainty at this stage as depends upon locational specificity.	**0?**	**0?**	**0?**
13: To protect and enhance the quality and character of townscapes & landscapes	The national design guide (2019)[140] sets out the characteristics of well-designed places & circular economy principles in building design[141] will contribute towards mitigating effects of climate change. It is also acknowledged that new proportional & high quality development can enhance the townscape. The current CLP includes policies to protect townscapes/landscapes, especially Policy DE1 Ensuring High Quality Design, and these will be updated in the CLP review. This indicates that sufficient mitigation measures will be provided through plan policies and thus, likely effect at least neutral for Options 2 & 3. The less than efficient use of land indicated by the quantum in Option 1 suggests that opportunities for enhancing the quality of townscape/landscape would not be progressed such that potential negative effects – uncertain as depends on locational specificity.	**-?**	**0**	**0**

[140] https://www.gov.uk/government/publications/national-design-guide

[141] For example, please see RIBA https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545 and BRE https://bregroup.com/products/breeam/breeam-solutions/breeam-circularity-and-resilience/

IIIg: Options for Quantum of Office Development	
1	8.5 hectares offices (HEDNA), assume 85,000 sq m
2	5.8 hectares offices (HEDNA less 2.7 hectares oversupply as per the ELR office market addendum) assume 58,000 sq m
3	4.12 hectares offices (reduced land take for offices as per the ELR office market addendum based on allowance of 10sqm per full time employee instead of 14sqm assumed previously, to allow for increased flexible and hybrid working patterns. This broadly equates to the more high level 30% reduction assumed by the HEDNA) (overall, 41,200 sq m)

		Options for Quantum of Office Development		
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	**1. 8.5 ha**	**2. 5.8 ha**	**3. 4.12 ha**
1: To enable vibrant and inclusive communities	Other factors are more likely to have potential significant effects on objectives for inclusive communities than the quantum of land for office development. However, provision of sufficient land for office development will support the economy and a diversity of jobs will overall contribute to vibrant & inclusive communities. The HEDNA (Nov 2022)[142] has considered employment land requirements across Coventry and Warwickshire looking to 2041 and 2050. For Coventry, the office land needs were calculated to be 8.5 ha to 2041 – and please see SA No 5 Economic Growth for more details. The ELR (May 2024)[143] further studied existing employment land & needs. A recent Office Market Study (June 2024)[144] focuses on the changes & trends in the office market since the HEDNA & ELR and to identify if the conclusions & recommendations are still valid. The Study raises issues for suitability & deliverability of existing allocations, potential over-supply, growing demands for flexible leases &	-?	0?	+

[142] Housing & Economic Development Needs Assessment (HEDNA, November 2022) Iceni Projects Ltd on behalf of Coventry & Warwickshire Local Authorities https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna

[143] DLP Planning Ltd for Coventry City Council (May 2024) Coventry Employment Land Review

[144] DLP Planning Ltd for Coventry City council (June 2024) Coventry Office Market Study: An Addendum to the Coventry Employment Land Review

	workspaces, together with on-site parking, and continuing flexible & hybrid working patterns. Option 1 reflects an earlier office development need. Updated evidence indicates that this quantum would be an over-supply & thus, would restrict possibilities for repurposing surplus office development land with potential negative effects for less than efficient use of land – uncertainty as depends on precise locations. Option 2 reflects the office development need updated to remove the oversupply. This indicates positive effects for the contribution that office land makes to vibrant communities but also some negative effects since use of land may not have been optimised – overall neutral effects. However, Option 3 reflects the updated office land needed & takes into account increased flexibility & hybrid working patterns – thus providing more certainty of significance of positive effects overall for communities.			
2: To provide accessible essential services and facilities for all residents	Other factors are more likely to have potential effects on objectives for accessibility to essential services & facilities than the quantum of office land – neutral/not applicable effects for all three options.	**0**	**0**	**0**
SA No 4: To provide decent and affordable housing for all	The provision of good quality new homes will support the ambitions for sustainable economic growth. There is a risk that continuing to progress Options 1& 2 is not the most efficient use of land & could compromise the availability of certain land for residential/mixed-use development & other uses. The opportunities for ensuring that office development land is located in the most sustainable locations could also be limited (other sites away from centres might need to be sought) – therefore, some potential negative effects indicated but uncertainty at this stage as depends on locational specificity. Positive effects for Option 3 as the repurposing of some previously allocated office land can release housing in suitable & sustainable locations.	**-?**	**-?**	**+**

5: To support sustainable inclusive economic growth	Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. Coventry has seen strong economic growth over the past few years and is recognised as a national centre for a number of growing business sectors, including advanced manufacturing and engineering; energy and low carbon; connected autonomous vehicles; business, professional & financial services; digital, creative, and gaming. These have all resulted in the creation of high-quality jobs for in growth sectors. However, there are a number of challenges, Coventry's economic growth and prosperity lags behind the England average and the city has fewer people in work compared to both regional and national figures[145]. It is notable that many of Coventry's private sector businesses are small or micro-businesses & the Council has an important priority to support SMEs[146]. Further priorities for creating the infrastructure to enable sustainable economic growth include innovating with multi-user developments (such as Friargate & City Centre South), and enabling the city to be cleaner & greener with GI & renewable energy. Option 1 reflects an earlier office development need. Updated evidence indicates that this quantum would be an over-supply & thus, would restrict possibilities for repurposing surplus office development land with potential negative effects for less than efficient use of land – uncertainty as depends on precise locations. Option 2 reflects the office development need updated to remove the oversupply, thus indicating potential positive effects for the contribution that office land makes to sustainable economic growth. However, Option 3 reflects the updated office land needed and takes into account increased flexibility & hybrid working patterns – thus providing more certainty of significance of effects. It also enables further positive effects for other SA objectives, such as for housing, by reducing the landtake for offices & releasing some land for repurposing. The Office Market Study (June 2024) confirmed the recommendations from the ELR (May 2024) that there is a need to reconsider the suitability & deliverability of existing	+?	++?	++

[145] One Coventry Plan 2022-2030 https://www.coventry.gov.uk/downloads/download/7162/one-coventry-plan-2022-2030
[146] Coventry City Council Economic Development Strategy 2022-2027 https://www.coventry.gov.uk/council-democracy/economic-development-strategy-2022-2027/3

	allocations without permission. CLP Policies will be updated to reflect the needs for more flexible office spaces, including adaptable internal arrangements & shared facilities – especially relevant to support the needs of start-up businesses & SMEs that are so important to Coventry.			
6: To help achieve the Council's ambition to reach net zero carbon emissions	The Council recognises the climate crisis and is currently reviewing its Strategy[147]. This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure. Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019[148]. It has been reported that the construction industry needs to decarbonise more urgently[149] and building design needs to progress principles in the circular economy. A major element of the review of the CLP is to address the Council's ambitions to reach net zero carbon emissions and all development will be required to meet with new policies – therefore, neutral effects for all three options.	**0**	**0**	**0**
7: To build resilience to climate change	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK.[150] Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to health & wellbeing, the economy, and the environment. A major element of the review of the CLP is to build resilience to climate change effects and all development will be required to meet with new and updated policies – therefore, neutral effects for all three options.	**0**	**0**	**0**
8: To reduce traffic & improve	Transport produced 24% of the UK's total emissions in 2020 & remains the largest emitting sector in the UK, with the majority of emissions from road vehicles[151].	**0**	**0**	**0**

[147] A Green Future for a Changing City(2022 – 2030) https://www.coventry.gov.uk/draftclimatechangestrategy
[148] UK Climate Change Committee https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Buildings.pdf
[149] For example, please see RAEng 2021 https://raeng.org.uk/news/construction-sector-must-move-further-and-faster-to-curb-carbon-emissions-say-engineers
[150] For example, see https://earth.org/climate-change-in-the-uk/
[151] https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022

sustainable transport choices	The Council will seek to select development that best support objectives for sustainable transport – therefore, neutral effects overall for all three options.			
9: To reduce air, noise & light pollution	No direct effects likely – neutral/not applicable. All development will be required to meet with EM Policies.	**0**	**0**	**0**
10: To protect & conserve natural resources – soil, water, minerals & waste[152]	With climate change, temperate soils are forecast to experience a high degree of variability in moisture conditions; restoring lost carbon through conventional approaches may take decades; and food security is an increasing issue. Soil has been recognised as an essential national asset & government has indicated that managing soil carbon could form a part of net zero plans[153]. The review of the CLP will continue to build on previously developed land (PDL) where effectively located & thus contribute towards protecting agricultural land. Many of the existing sites are on PDL indicating positive effects for conserving soil but Option 1 does not use land as effectively as Options 2 & 3 such that the positive/negative effects indicate overall neutral. Some uncertainty of effects for Options 1 & 2 whilst for Option 3 that has most effectively used land, positive effects are more certain. Climate change, particularly incidences of hotter, drier, summers may exacerbate water supply issues; wetter weather and more flooding may overload wastewater systems. The cumulative effects of increased development on soil & water resources is uncertain, particularly in the shorter-medium term before the effects of net zero carbon actions are implemented & become effective. CLP Policies EM1-EM6 will be updated & thus provide sufficient mitigation for all development – therefore, likely effects are neutral for all three options. The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that at least neutral effects would be indicated for all three options.	**0?** **0**	**+?** **0**	**+** **0**

[152] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[153] UK Horizon scanning (April 2021) https://post.parliament.uk/soil-as-an-essential-national-asset/

	Progressions with the circular economy, driven by the need to reduce carbon emissions & encouraged through higher standards, will conserve minerals & reduce/minimise/reuse waste with some potential further positive effects in the longer term but with uncertainty of significance.			
11: To protect and enhance nature & biodiversity	It will be necessary to consider the new requirements from the Environment Act and including emerging metrics for calculating biodiversity net gain[154]. Unequal distribution, and access to, green infrastructure across the city can exacerbate health inequalities. There are priority areas that would benefit particularly from greening. Off-site areas for biodiversity net gain may be needed. Increased recreational pressures and water quality impacts (such as road run-off) as a result of new development can put pressure on GI and biodiversity. Climate change is likely to affect changes to habitats and species distribution. The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide further mitigation measures such that there will be no major significant negative effects. All development will have to meet with new requirements for Biodiversity Net Gain & therefore, positive effects indicated for all options but some uncertainty of significance at this stage. The Council will continue to aim to allocate employment sites to PDL & new development can create opportunities for enhancing GI and biodiversity with potential positive effects but uncertainty at this stage as depends upon locational specificity.	**+?**	**+?**	**+?**
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide sufficient mitigation measures to avoid significant negative effects on the historic environment – but some uncertainty at this stage as depends upon locational specificity.	**0?**	**0?**	**0?**

[154] Biodiversity Metric 4.0 (JP039) 2021 https://publications.naturalengland.org.uk/publication/6049804846366720

13: To protect and enhance the quality and character of townscapes & landscapes	The national design guide (2019)[155] sets out the characteristics of well-designed places & circular economy principles in building design[156] will contribute towards mitigating effects of climate change. It is also acknowledged that new proportional & high quality development can enhance the townscape. The current CLP includes policies to protect townscapes/landscapes, especially Policy DE1 Ensuring High Quality Design, and these will be updated in the CLP review. This indicates that sufficient mitigation measures will be provided through plan policies and thus, likely effect at least neutral for Options 2 & 3. The less than efficient use of land indicated by the quantum in Option 1 suggests that opportunities for enhancing the quality of townscape/landscape would not be progressed such that potential negative effects – uncertain as depends on locational specificity.	**-?**	**0**	**0**

[155] https://www.gov.uk/government/publications/national-design-guide

[156] For example, please see RIBA https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545 and BRE https://bregroup.com/products/breeam/breeam-solutions/breeam-circularity-and-resilience/

IIIh: Options for Distribution of Office Development	
1	City Centre focus including Friargate
2	A more dispersed approach
3	City Centre focus to include 39,549 sqm floorspace at Friargate and the rest distributed to other defined centres (overall, 41,200 sq m)

		Options for Distribution of Office Development		
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	**1. City Centre focus**	**2. More Dispersed Approach**	**3. City Centre focus (Friargate) & rest to other defined centres**
1: To enable vibrant and inclusive communities	Other factors are likely to have more significant effects on objectives for inclusive communities; however, distribution of sufficient land for offices to support the economy and a diversity of jobs will overall contribute to vibrant & inclusive communities. Many of Coventry's businesses are small or micro-businesses & the Council has an important priority to support such SMEs[157]. The Coventry Office Market Study (June 2024)[158] confirmed the need for flexibility & adaptability for office spaces.	**+?**	**+?**	**+**

[157] Coventry City Council Economic Development Strategy 2022-2027 https://www.coventry.gov.uk/council-democracy/economic-development-strategy-2022-2027/3
[158] DLP Planning Ltd for Coventry City council (June 2024) Coventry Office Market Study: An Addendum to the Coventry Employment Land Review

	Option 1 and Option 2 have some uncertainty of positive effects whilst Option 3 that incorporates both city centre & distribution to the identified centres indicates more certainty as more likely to address future type & locational needs for office working – and throughout the CLP area.			
2: To provide accessible essential services and facilities for all residents	Other factors are more likely to have potential effects on objectives for accessibility to essential services & facilities than the quantum of employment land – neutral effects for all three options.	**0**	**0**	**0**
3: To improve health & promote active living	The relationship between fair employment, good work and health has been recognised for many years. Whilst employment rates have increased nationally since 2010, there has been an increase in poor quality work, including part-time, insecure employment (Marmot Review 10 years on, 2020)[159]. Unemployment and poor quality work are major drivers of inequalities in physical and mental health. Option 1 and Option 2 have uncertainty of positive effects whilst Option 3 that incorporates both city centre and distribution to the identified centres indicates more certainty as more likely to address future type & locational needs for office working.	**+?**	**+?**	**+**
SA No 4: To provide decent and affordable housing for all	The provision of good quality new homes will support the ambitions for sustainable economic growth. Neutral/not applicable effects for all three options.	**0**	**0**	**0**
5: To support sustainable inclusive economic growth	It is notable that many of Coventry's private sector businesses are small or micro-businesses & the Council has an important priority to support such SMEs[160]. Options 1 & 3 include opportunities for innovating with the multi-user development of Friargate, and better enabling the city to be cleaner & greener with GI & renewable energy since such developments are better able to incorporate enhanced levels of quality & energy efficiencies. Options 2 & 3 may better support smaller start-ups & SMEs for all through a dispersed approach but Option 2 does not necessarily align office land	**+?**	**+?**	**++**

[159] The Health Foundation (Feb 2020) Health Equity in England: The Marmot Review 10 Years On https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on
[160] Coventry City Council Economic Development Strategy 2022-2027 https://www.coventry.gov.uk/council-democracy/economic-development-strategy-2022-2027/3

	with strong accessibility to sustainable services/facilities & travel, such that some uncertainty of positive effects. Option 3 supports the needs for flexibility & adaptability, support for smaller start-ups & SMEs, and with both a city centre focus & dispersion to the other defined centres, provides office land throughout the CLP area and aligned with sustainable locations such that more positive effects are more certain.			
6: To help achieve the Council's ambition to reach net zero carbon emissions	The Council recognises the climate crisis and is currently reviewing its Strategy[161]. This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure. A major element of the review of the CLP is to address the Council's ambitions to reach net zero carbon emissions and all development will be required to meet with new policy – therefore, neutral effects for all three options.	**0**	**0**	**0**
7: To build resilience to climate change	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK.[162] Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to health & wellbeing, the economy, and the environment. A major element of the review of the CLP is to build resilience to climate change effects and all development will be required to meet with new and updated policies – therefore, neutral effects for all three options.	**0**	**0**	**0**
8: To reduce traffic & improve sustainable transport choices	Transport produced 24% of the UK's total emissions in 2020 & remains the largest emitting sector in the UK, with the majority of emissions from road vehicles[163]. Options 1 & 3 comprise office land located in the city centre & other defined centres, thus confirming that workplaces will be allocated with sustainable travel; Option 2 dispersed throughout the CLP indicates the potential for some negative effects but uncertainty as depends on locational specificity.	**0**	**-?**	**0**

[161] A Green Future for a Changing City(2022 – 2030) https://www.coventry.gov.uk/draftclimatechangestrategy
[162] For example, see https://earth.org/climate-change-in-the-uk/
[163] https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022

9: To reduce air, noise & light pollution	No direct effects likely – neutral/not applicable. All development will be required to meet with EM Policies.	**0**	**0**	**0**
10: To protect & conserve natural resources – soil, water, minerals & waste[164]	CLP Policies EM1-EM6 will be updated & thus provide sufficient mitigation for all development – therefore, likely effects are neutral for all three options. The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	**0** **0**	**0** **0**	**0** **0**
11: To protect and enhance nature & biodiversity	The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide further mitigation measures aiming for no major significant negative effects. All development will have to meet with new requirements for Biodiversity Net Gain & therefore, positive effects indicated for all options but some uncertainty of significance at this stage. The Council will continue to aim to allocate office sites to PDL & new development can create opportunities for enhancing GI and biodiversity with potential positive effects but uncertainty at this stage as depends upon locational specificity.	**+?**	**+?**	**+?**
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide sufficient mitigation measures to avoid significant negative effects on the historic environment – but some uncertainty at this stage as depends upon locational specificity.	**0?**	**0?**	**0?**
13: To protect and enhance the	The national design guide (2019)[165] sets out the characteristics of well-designed places & circular economy principles in building design[166] will contribute towards mitigating	**0**	**0**	**0**

[164] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[165] https://www.gov.uk/government/publications/national-design-guide
[166] For example, please see RIBA https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545 and BRE https://bregroup.com/products/breeam/breeam-solutions/breeam-circularity-and-resilience/

quality and character of townscapes & landscapes	effects of climate change. It is also acknowledged that new proportional & high quality development can enhance the townscape. The current CLP includes policies to protect townscapes/landscapes, especially Policy DE1 Ensuring High Quality Design, and these will be updated in the CLP review. This indicates that sufficient mitigation measures will be provided through plan policies and thus, likely effect at least neutral for all options.			

IIIi: Options for Purpose Built Student Accommodation (PBSA)	
1	Retain Policy H10 Student Accommodation as adopted Plan (2017)
2	PBSA to be located at campus/city university area unless evidence demonstrates otherwise on a case by case basis

		Options for PBSA	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	**1. Retain existing Policy H10**	**2. PBSA located at campus, city university area**
1: To enable vibrant and inclusive communities	Other factors are more likely to have potential effects on objectives for inclusive communities than locations for PBSA. However, a concentration of PBSA in a particular neighbourhood could result in an imbalance that might adversely affect the vibrancy and inclusivity of communities, such that some negative effects indicated for Option – uncertain as depends on location. The level of student population in the city is also a factor affecting the amount and distribution of Homes in Multiple Occupation (HMO)s. The residential areas that tend to have high concentrations of student populations are the areas that surround or are accessible easily to the city's two universities. Significant concentrations in particular streets and neighbourhoods have already had negative impacts on local communities. The Council has prepared an HMO DPD[167] and this addresses issues such as effects on communities and the housing stock (please see SA No 4 later).	-?	0

[167] https://www.coventry.gov.uk/planning-policy/homes-multiple-occupation-development-plan-document

2: To provide accessible essential services and facilities for all residents	Existing Policy H10 requires that there should be no disadvantages to local services – neutral effects for both options.	**0**	**0**
3: To improve health & promote active living	Provision of good quality housing will have positive effects on health & wellbeing regardless of location. There is the potential for some uncertainty of significance for Option 1 as continued provision of PBSA throughout the LP area could result in concentrations of students in some areas that then could affect the wellbeing of local residents with different lifestyles. The PBSA Study (July 2024)[168] indicates that poorer quality student accommodation has been delivered and that this poorer quality stock is concentrated in the City Centre – therefore, some uncertainty about the significance of positive effects from continuing with H10 as set out in Option 1. **SA Suggestion**: ▪ Require sufficient standards of building quality and design in PBSA to ensure decent homes & associated health & wellbeing	**+?**	**+**
SA No 4: To provide decent and affordable housing for all	As the fastest growing higher education institution in the UK, Coventry University now teaches one in every seven higher education students in the West Midlands & has more than 30,000 students across its UK campuses[169]. Coventry is the larger of the two universities located in the city; it is a public research university with two campuses – one in the centre of Coventry with the majority of operations and another in central London. The University of Warwick is a campus university (720 acres) on the outskirts of Coventry. Capacity (HELAA 2024)[170] studies have determined that identified needs of approx. 31,500 new dwellings can be accommodated within the urban areas - and including the needs of students. In these studies, it was recognised that a significant amount of the windfall delivery has been through the provision of PBSA. As such, the windfall expectation has been tempered to 200 dwellings pa to take account of the reduced expectation of further PBSA schemes to come forward.	**-**	**+**

[168] Cushman & Wakefield (July 2024) for Coventry CC Purpose Built Student Accommodation Market Study
[169] https://www.coventry.ac.uk/
[170] Coventry City Council (2024) Housing & Economic Land Availability Assessment https://www.coventry.gov.uk/planning-policy/local-plan-review/3

	The PBSA Study (July 2024)[171] found that the student to bed ratio in the City has now fallen to an unhealthy level which is impacting occupancy and arguably the long-term sustainability of some developments. Too many beds (and beds of the wrong type) are being delivered to the market. The overdevelopment of PBSA has implications for wider strategy in terms of development site availability, potential underoccupation of PBSA developments, and future change of use for alternative occupation. Over the longer term, this could be potentially damaging to the attractiveness of Coventry as a student destination and would stifle innovation. It also found that poorer quality student accommodation has been delivered and that this poorer quality stock is concentrated in the City Centre – therefore, negative effects indicated for Option 1 that could become significant cumulative effects. By limiting PBSA to the campus & city university area, the student population is more focused and very easily accessible to learning & other services in the city centre – with positive effects. Retaining the existing Policy H10 could result in HMOs/PBSA not being used most effectively and with negative effects for housing objectives as could take up land that is needed for other essential housing needs. **SA Suggestion**: ▪ Require sufficient standards of building quality and design in PBSA to ensure decent homes		
5: To support sustainable inclusive economic growth	Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. The university is one of the city's biggest employers bringing skills and education to the region and helping to continue the growth of staff and student spending, job creation and graduate success. Provision of PBSA will support the economy of the university but regardless of options for PBSA – neutral effects for both options but some uncertainty for Option 1 as poorer quality student accommodation may adversely affect choice of university and thus, support for economic growth objectives in this sector.	**0?**	**0**
6: To help achieve the Council's ambition to reach net zero carbon emissions	The Council recognises the climate crisis and is currently reviewing its Strategy[172]. This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure.	**0**	**0**

[171] Cushman & Wakefield (July 2024) for Coventry CC Purpose Built Student Accommodation Market Study
[172] A Green Future for a Changing City(2022 – 2030) https://www.coventry.gov.uk/draftclimatechangestrategy

	Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019[173]. It has been reported that the construction industry needs to decarbonise more urgently[174] and building design needs to progress principles in the circular economy. All development will have to reduce GHG emissions in line with updated planning policy – therefore, neutral effects.		
7: To build resilience to climate change	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK.[175] Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to health & wellbeing, the economy, and the environment. All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change – therefore, neutral effects.	**0**	**0**
8: To reduce traffic & improve sustainable transport choices	Transport produced 24% of the UK's total emissions in 2020 & remains the largest emitting sector in the UK, with the majority of emissions from road vehicles[176]. The current Policy H10 requires that PBSA should be "directly accessible" from the universities; however, by focusing PBSA in the campus/city university area, sustainable transport will be more certain with positive effects for Option 2.	**0**	**+**
9: To reduce air, noise & light pollution	The current Policy H10 requires that any PBSA will not materially harm the amenities of occupiers of nearby properties & therefore, neutral effects for both options.	**0**	**0**
10: To protect & conserve natural resources – soil, water, minerals & waste[177]	The review of the CLP will continue to build on previously developed land (PDL) where effectively located & thus contribute towards protecting agricultural land. The recent Water Cycle Study Stage 1 (June 2024)[178] indicates that there is water capacity for the preferred residential quantum and therefore, likely neutral effects for both options. The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that at least neutral effects would be indicated for both options.	**0** **0**	**0** **0**

[173] UK Climate Change Committee https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Buildings.pdf
[174] For example, please see RAEng 2021 https://raeng.org.uk/news/construction-sector-must-move-further-and-faster-to-curb-carbon-emissions-say-engineers
[175] For example, see https://earth.org/climate-change-in-the-uk/
[176] https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022
[177] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[178] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratfor on Avon DC, & Warwick DC

11: To protect and enhance nature & biodiversity	The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These will be updated & should provide sufficient mitigation measures - all development will have to meet with new requirements for Biodiversity Net Gain & therefore, positive effects indicated for all options but some uncertainty of significance at this stage.	**+?**	**+?**
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment – with likely neutral effects for both options but more certainty of mitigation measures for Option 2 as PBSA focused on campus/university area.	**0?**	**0**
13: To protect and enhance the quality and character of townscapes & landscapes	The current Policy H10 requires that any PBSA will not materially harm the amenities of occupiers of nearby properties & therefore, likely neutral effects for both options but more certainty of mitigation measures for Option 2 as PBSA focused on campus/university area.	**0?**	**0**

Appendix IV: SA Consultation Representations & Responses
Consultation Representations to SA Initial Report (May 2023) at Regulation 18 Stage Issues & Options

Section of SA Report	Consultee & Comments	Enfusion Responses & Action Taken
Environment Agency		
	No specific comments on the SA at this stage	Noted
Historic England		
	Broadly welcome the changes proposed, however, in regard to options 2 and 3 for quantum of housing development these should be changed to show there is the potential for harm to the historic environment, dependent upon the location of development sites. When specific allocations are being considered, the methodology and its findings are set out within an updated Heritage topic paper. In regard to 'Options for Residential Density', this is uncertain at this stage of the local plan review and the SA should reflect this, not sat there are negligible effects.	Agreed, with thanks
Natural England		
	An appropriate evidence base should be used to support the selection of sites and inform the policies for their delivery. This should include: • Landscape and Visual Impact Assessments, Landscape Sensitivity Assessments and Landscape Character Assessments. • Soil surveys and mapping (Agricultural Land Classification available on Magic maps) ecological surveys, green infrastructure and biodiversity opportunity mapping The Plan should contain policies to protect Best and Most Versatile (BMV) agricultural land (Grades 1, 2, 3a). Polices should avoid the loss of BMV land. Any development proposed on BMV land should be informed by a detailed soil survey.	Noted & agreed.

Section of SA Report	Consultee & Comments	Enfusion Responses & Action Taken
	(NPPF paragraph 174(b)) Site selection must also be informed by the relevant environmental assessments. These are: • Sustainability Appraisal incorporating Strategic Environmental Assessment with recommendations used to inform mitigation measures and design principles for the allocated sites. • Habitats Regulations Assessment: mitigation and avoidance measures identified through the HRA should be secured through policies in the Plan. Where mitigation or avoidance is not possible the site should not be allocated.	
William Davis Homes		
	It is clear that the "exceptional local circumstances" required by the NPPF in order to depart from the use of Standard Method (SM) have not been established and the SM should therefore provide the basis of calculating the Local Housing Need (LHN). The Issues and Options consultation proposes to ignore the 35% uplift to the LHN required without any reasoned justification. The housing requirement in the Local Plan should be identified based on the SM being "a minimum starting point in determining the number of homes needed in an area" as set out in the PPG, increase growth could be necessary as part of major infrastructure projects such as the NUCKLE rail improvements and A45 and A46 improvements; and that the city is part of the WMCA which has a growth agenda. Failure to do so will exacerbate the housing crisis and perpetrate its acute socio-economic consequences in the area. These matters do not appear to have been adequately assessed in the initial SA and WDH's concerns in this respect are exacerbated by the overstated land supply position set out in the Issues and Options Consultation, which would suggest that the housing land supply strategy should include sustainable sites in the greenbelt around the city. It is clear that "exceptional circumstances" exist to justify the release of land from the Green Belt for development as set out in the NPPF.	Noted with thanks. Identification & refinement of strategic options is an iterative process between the plan-making & SA teams. Taking into account consultation responses and further evidence, additional strategic options for the CPLR were developed that required testing through SA – and this includes: ▪ Potential for development in the Green Belt ▪ No potential development in the Green Belt

Section of SA Report	Consultee & Comments	Enfusion Responses & Action Taken
	The SA Report (May 2023) only considers a very limited number of Strategic Options relating to the Quantum of Housing Needs, Residential Density, Climate Change and BNG. It completely fails to consider any spatial strategy options, the opportunity to allocate additional residential development sites, including sites that are currently within the designated Green Belt, or the implications of not fully addressing the identified housing needs in the City. This all indicates CCC's apparent willingness to forgo meeting the City's market and affordable housing needs and exacerbate the socio-economic consequences of the housing crisis in favour of protecting sites in the Green Belt that would otherwise be entirely appropriate for sustainable residential development. CCC must continue to plan on the basis of the current NPPF position, not the Governments proposed changes. The Labour Party have already said if they come to power they support the review of Green Belt land to facilitate housing delivery.	The SA Report (August 2024) has been able to take into account Government's proposals for revision to the NPPF, including for grey belt land in the Green Belt.

Coventry Local Plan Review: Sustainability Appraisal (SA) Appendix V: SA of Proposed New & Amended Site Allocations & Potential New Employment Site

Proposed Site Allocations					
		Area (hectare)	Capacity (number of homes)		
Site Ref	**Name & Location**		Existing density at 200dph	Proposed minimum 250 dph	Assessed capacity
	New Allocations				
STM009-24	Coventry Central Police Station, Little Park Street	1.19	238	298	600
STM011-24	New Union Street	0.35	70	88	170
R003-23	Former Vintage House, St Nicholas Street/Leicester Row CV1 4BN	0.23	46	57	100
STM012-24	Whitefriars Street Car Park	0.6	120	150	185
F008-24	Paybody Building, Stoney Stanton Road	0.73	146	182	280
STM013-24	Dale Buildings, Tower Street	0.37	74	92	200
STM18-24	City Centre South, Coventry	6.91	1,382	1,727	1,575
			At 35 dph	At 45 dph	Assessed capacity
STM001-23	New Gate Court Business Park, Paradise Street, CV1 2RU	0.57	20	26	303
BAB001-23	The Allesley Hotel, Birmingham Road	2.0	70	90	48
BW001-23	Former Chace School, Chace Avenue, Willenhall	1.4	49	63	60
LS001-23	Former School Site, New Century Park – Land to the south of Isadora Lea	2.58	90	116	93
			At 35 dph	At 125 dph	Assessed capacity
SH004-24	Land at Spon End	7.2	252	1,116	750
	Existing Allocations with Changes				
HE002-24	H2:3 Walsgrave Hill Farm	59			900
R004-24	H2:15 Sandy Lane	2.7			250
STM014-24	JE2:1 Friargate Mixed Use Scheme, City Centre	10.0			1,350
	Employment				
BAB016-24	Land North of A45 at Pickford Green	11.81			11.81 ha

Key: Categories of Significance		
Symbol	**Meaning**	**Sustainability Effect**
- -	Major Negative	Problematical & improbable due to known sustainability issues; mitigation difficult and/or expensive
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
+	Minor Positive	No sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing sustainability problem
?	Uncertain	Uncertain or Unknown Effects
0	Neutral/Neutral	Negligible effects or not applicable
SA No 10 split cell – first symbol refers to land/soil & water resources; second symbol refers to minerals & waste		

STM009-24	**Coventry Central Police Station, Little Park Street** Area: 1.19 hectares **Capacity: 600 dwellings**	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	
1: To enable vibrant and inclusive communities	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site in the city centre. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	**+**
2: To provide accessible essential services and facilities for all residents	Major positive effects indicated for this city centre location close to a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby[179] such as Greyfriars Green & St Michael's Fields, and within a mile, wider spaces such as Spencer Park & Charterhouse Field.	**++**
3: To improve health & promote active living	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental[180]. These factors are covered by the following SA Nos 4 & 5. There are some 9 health centres/general practices and 9 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances. With a city centre location, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios. There is also easy access to a wide range of food shopping with associated positive effects for health.	**+**

[179] Approximate measurements made using Google Maps https://www.google.co.uk/maps/place/Coventry
[180] For example: https://commonslibrary.parliament.uk/research-briefings/cbp-9414/

	The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD[181] provides information and guidance on completing the relevant health toolkit and HIA.	
4: To provide decent and affordable housing for all	Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The indicative capacity & city centre location are suitable for a flatted/high rise format & should be able to offer a range of adaptable and affordable tenures– all with likely major positive effects. The Affordable Housing SPD (March 2022)[182] provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.	**++**
5: To support sustainable inclusive economic growth	Whilst provision of new homes is not directly attributable to economic growth, good quality homes in a city centre location will support working people. Overall – neutral/not applicable effects.	**0**
6: To help achieve the Council's ambition to reach net zero carbon emissions	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall. Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD[183] currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	**0**
7: To build resilience to	All new housing development will need to meet updated policy requirements that seek to help the Council build	**0**

[181] Health Impact Assessment (HIA) Supplementary Planning Document (SPD)https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2
[182] https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd
[183]Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) https://www.coventry.gov.uk/downloads/file/37976/energy-spd

climate change	resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	
8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is less than 15 minutes' walk to the south-west of the site. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11). **SA Suggestion**: Limit parking & provide secure cycle storage/sharing	**++**
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	**0**
10: To protect & conserve natural resources – soil, water, minerals & waste[184]	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)[185] indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	**+** **0**
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	**+?**
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to	**0?**

[184] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[185] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	avoid significant negative effects on the historic environment. The site is within the city centre & within the Three Spires View Cone - The Tall Buildings Design Guide & Three Spires View Framework SPD (2022)[186] provides further guidance to mitigate potential effects. It is also within an archaeological constraint area but other plan policies provide mitigation measures. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies.	
13: To protect and enhance the quality and character of townscapes & landscapes	A tall building is suitable for such a city centre location and designed according to policies and guides as described for SA No 12 will ensure that potential negative effects are mitigated. Likely neutral effects but uncertain as depends upon project level studies.	**0?**

STM011-24	**New Union Street** Area: 0.35 hectares **Capacity: 170 dwellings**	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	
1: To enable vibrant and inclusive communities	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site in the city centre. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	**+**
2: To provide accessible essential	Major positive effects indicated for this city centre location close to a wide range of services & facilities, including schools, nurseries, shops, community & faith	**++**

186 https://edemocracy.coventry.gov.uk/documents/s54726/Appendix%201%20Draft%20Tall%20Building%20View%20Management%20Framework%20Guide%20SPD.pdf

services and facilities for all residents	centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby such as Greyfriars Green & St Michael's Fields, and within a mile, wider spaces such as Spencer Park & Charterhouse Field.	
3: To improve health & promote active living	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental[187]. These factors are covered by the following SA Nos 4 & 5. There are some 9 health centres/general practices and 9 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances. With a city centre location, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios. There is also easy access to a wide range of food shopping with associated positive effects for health. The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD[188] provides information and guidance on completing the relevant health toolkit and HIA.	+
4: To provide decent and affordable housing for all	Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The indicative capacity & city centre location should be able to offer a range of adaptable and affordable tenures – all with likely major positive effects. The Affordable Housing SPD (March 2022)[189] provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.	++
5: To support sustainable inclusive	Whilst provision of new homes is not directly attributable to economic growth, good quality homes in a city centre	0

[187] For example: https://commonslibrary.parliament.uk/research-briefings/cbp-9414/
[188] Health Impact Assessment (HIA) Supplementary Planning Document (SPD)https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2
[189] https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd

economic growth	location will support working people. Overall – neutral/not applicable effects.	
6: To help achieve the Council's ambition to reach net zero carbon emissions	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall. Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD[190] currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	**0**
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	**0**
8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is less than 15 minutes' walk to the south-west of the site. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	**++**
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	**0**
10: To protect & conserve natural resources – soil, water, minerals & waste[191]	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)[192] indicates that there is water capacity for the identified development need – indicating neutral effects.	**+** **0**

[190]Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) https://www.coventry.gov.uk/downloads/file/37976/energy-spd
[191] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[192] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratfor on Avon DC, & Warwick DC

	Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	**+?**
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. The site is within the city centre & within the Three Spires View Cone - The Tall Buildings Design Guide & Three Spires View Framework SPD (2022)[193] provides further guidance to mitigate potential effects. It is also within an archaeological constraint area but other plan policies provide mitigation. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies.	**0?**
13: To protect and enhance the quality and character of townscapes & landscapes	A city centre location and designed according to policies and guides as described above for SA No 12 will ensure that potential negative effects are mitigated. Likely positive effects as the regeneration of vacant multistorey and surface car parks will improve the quality and character of the townscape.	**+**

193 https://edemocracy.coventry.gov.uk/documents/s54726/Appendix%201%20Draft%20Tall%20Building%20View%20Management%20Framework%20Guide%20SPD.pdf

R003-23	**Former Vintage House, St Nicholas Street/Leicester Row** Area: 0.23 hectares **Capacity: 100 dwellings**	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	
1: To enable vibrant and inclusive communities	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site in the city centre. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	+
2: To provide accessible essential services and facilities for all residents	Major positive effects indicated for this location in the city centre and a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby such as Lady Herbert's Gardens, Swanswell Park & Pool, and Naul's Mill Park – and within 5 minutes' walk of the historic Coventry Canal Basin with warehousing, barges, boat rides, shops & café.	++
3: To improve health & promote active living	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental[194]. These factors are covered by the following SA Nos 4 & 5. There are some 9 health centres/general practices and 9 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances. With a location in the city centre, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the towpath. There is also easy access to a wide range of food shopping with associated positive effects for health.	+

[194] For example: https://commonslibrary.parliament.uk/research-briefings/cbp-9414/

	The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD[195] provides information and guidance on completing the relevant health toolkit and HIA.	
4: To provide decent and affordable housing for all	Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is so close to the city centre & with likely major positive effects. The Affordable Housing SPD (March 2022)[196] provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.	**++**
5: To support sustainable inclusive economic growth	Whilst provision of new homes is not directly attributable to economic growth, good quality homes in the city centre will support working people. Overall – neutral/not applicable effects.	**0**
6: To help achieve the Council's ambition to reach net zero carbon emissions	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall. Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD[197] currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	**0**
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	**0**

[195] Health Impact Assessment (HIA) Supplementary Planning Document (SPD)https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2
[196] https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd
[197]Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) https://www.coventry.gov.uk/downloads/file/37976/energy-spd

8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is some 25 minutes' walk to the south of the site. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	++
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
10: To protect & conserve natural resources – soil, water, minerals & waste[198]	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)[199] indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	+ 0
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	+?
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. The site is not within the Three Spires View Cone nor an archaeological constraint area; it is within the Coventry Canal Conservation Area & will need sensitive design - other plan policies should provide mitigation measures.	0?

[198] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[199] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratfor on Avon DC, & Warwick DC

	Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies & creative detailed design.	
13: To protect and enhance the quality and character of townscapes & landscapes	A location in the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated. Likely positive effects as the regeneration of a vacant and cleared site will improve the quality and character of the townscape.	+

STM012-24	**Whitefriars Street Car Park** Area: 0.6 hectares **Capacity: 185 dwellings**	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	
1: To enable vibrant and inclusive communities	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site in the city centre. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	+
2: To provide accessible essential services and facilities for all residents	Major positive effects indicated for this location in the city centre and a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby such as Lady Herbert's Gardens, Swanswell Park & Pool, and Charterhouse Field.	++
3: To improve health & promote active living	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental[200]. These factors are covered by the following SA Nos 4 & 5. There are some 9 health centres/general practices and 9	+

[200] For example: https://commonslibrary.parliament.uk/research-briefings/cbp-9414/

	dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances. With a location in the city centre, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the towpath. There is also easy access to a wide range of food shopping with associated positive effects for health. The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD[201] provides information and guidance on completing the relevant health toolkit and HIA.	
4: To provide decent and affordable housing for all	Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is so close to the city centre & with likely major positive effects. The Affordable Housing SPD (March 2022)[202] provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.	**++**
5: To support sustainable inclusive economic growth	Whilst provision of new homes is not directly attributable to economic growth, good quality homes in the city centre will support working people. Overall – neutral/not applicable effects.	**0**
6: To help achieve the Council's ambition to reach net zero carbon emissions	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall. Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality	**0**

[201] Health Impact Assessment (HIA) Supplementary Planning Document (SPD)https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2
[202] https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd

	Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD[203] currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	**0**
8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is some 17 minutes' walk to the south-west of the site. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	**++**
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	**0**
10: To protect & conserve natural resources – soil, water, minerals & waste[204]	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)[205] indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	**+** **0**
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects	**+?**

[203]Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) https://www.coventry.gov.uk/downloads/file/37976/energy-spd
[204] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[205] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratfor on Avon DC, & Warwick DC

	but uncertainty of significance as depends on detailed project design.	
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. The site is within the city centre & within the Three Spires View Cone and an archaeological constraint area - The Tall Buildings Design Guide & Three Spires View Framework SPD (2022)[206] provides further guidance to mitigate potential effects - other plan policies should provide mitigation measures. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies & creative detailed design.	**0?**
13: To protect and enhance the quality and character of townscapes & landscapes	A location in the city centre and designed according to policies as described above for SA No 12 should ensure that potential negative effects are mitigated. Likely positive effects as the regeneration of a car park site will improve the quality and character of the townscape.	**+**

206 https://edemocracy.coventry.gov.uk/documents/s54726/Appendix%201%20Draft%20Tall%20Building%20View%20Management%20Framework%20Guide%20SPD.pdf

F008-24	**Paybody Building, Stoney Stanton Road** Area: 0.73 hectares **Capacity: 280 dwellings**	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	
1: To enable vibrant and inclusive communities	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site in the city centre. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	+
2: To provide accessible essential services and facilities for all residents	Major positive effects indicated for this location in the city centre and a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby such as Lady Herbert's Gardens, Swanswell Park & Pool, Radford Recreation Ground, and Naul's Mill Park – and the Coventry Canal towpath for wider walking is nearby within 5 mins walk.	++
3: To improve health & promote active living	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental[207]. These factors are covered by the following SA Nos 4 & 5. There are some 7 health centres/general practices and 5 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances. With a location in the city centre, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the towpath. There is also easy access to a wide range of food shopping with associated positive effects for health. The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1	+

[207] For example: https://commonslibrary.parliament.uk/research-briefings/cbp-9414/

	High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD[208] provides information and guidance on completing the relevant health toolkit and HIA.	
4: To provide decent and affordable housing for all	Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is so close to the city centre & with likely major positive effects. The Affordable Housing SPD (March 2022)[209] provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.	**++**
5: To support sustainable inclusive economic growth	Whilst provision of new homes is not directly attributable to economic growth, good quality homes in the city centre will support working people. Overall – neutral/not applicable effects.	**0**
6: To help achieve the Council's ambition to reach net zero carbon emissions	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall. Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD[210] currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	**0**
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	**0**

[208] Health Impact Assessment (HIA) Supplementary Planning Document (SPD)https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2
[209] https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd
[210]Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) https://www.coventry.gov.uk/downloads/file/37976/energy-spd

8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is some 27 minutes' walk to the south of the site. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	++
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
10: To protect & conserve natural resources – soil, water, minerals & waste[211]	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)[212] indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	+ 0
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	+?
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. The site is within the city centre & within an archaeological constraint area - other plan policies should provide mitigation measures. Therefore, likely neutral effects on the historic environment but some	0?

[211] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[212] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratfor on Avon DC, & Warwick DC

	uncertainty as depends on project level studies & creative detailed design.	
13: To protect and enhance the quality and character of townscapes & landscapes	A location in the city centre and designed according to policies as described above for SA No 12 should ensure that potential negative effects are mitigated. Likely positive effects as the regeneration of an existing NHS facility with large car park is likely to improve the quality and character of the townscape.	+

STM013-24	**Dale Buildings, Tower Street** Area: 0.37 hectares **Capacity: 200 dwellings**	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	
1: To enable vibrant and inclusive communities	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site in the city centre. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	+
2: To provide accessible essential services and facilities for all residents	Major positive effects indicated for this location in the city centre and a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby such as Lady Herbert's Gardens, Swanswell Park & Pool, and Naul's Mill Park – and less than 10 minutes' walk of the historic Coventry Canal Basin with warehousing, barges, boat rides, shops & cafés.	++
3: To improve health &	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental[213]. There are	+

[213] For example: https://commonslibrary.parliament.uk/research-briefings/cbp-9414/

promote active living	some 9 health centres/general practices and 10 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances. These factors are covered by the following SA Nos 4 & 5. With a location so close to the city centre, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the canal towpath. There is also easy access to a wide range of food shopping with associated positive effects for health. The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD[214] provides information and guidance on completing the relevant health toolkit and HIA.	
4: To provide decent and affordable housing for all	Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is so close to the city centre & with likely major positive effects. The Affordable Housing SPD (March 2022)[215] provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.	**++**
5: To support sustainable inclusive economic growth	Whilst provision of new homes is not directly attributable to economic growth, good quality homes in the city centre will support working people. Overall – neutral/not applicable effects.	**0**
6: To help achieve the Council's ambition to reach net zero carbon emissions	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall.	**0**

[214] Health Impact Assessment (HIA) Supplementary Planning Document (SPD)https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2
[215] https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd

	Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD[216] currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	**0**
8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is some 20 minutes' walk to the south of the site. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	**++**
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	**0**
10: To protect & conserve natural resources – soil, water, minerals & waste[217]	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)[218] indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	**+** **0**
11: To protect and enhance	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity.	**+?**

[216]Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) https://www.coventry.gov.uk/downloads/file/37976/energy-spd
[217] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[218] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratfor on Avon DC, & Warwick DC

nature & biodiversity	These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. The site is within the Three Spires View Cone & an archaeological constraint area; it is near to the Lady Herbert's Garden & Burgess Conservation Area & will need sensitive design - other plan policies provide mitigation. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies & creative detailed design.	**0?**
13: To protect and enhance the quality and character of townscapes & landscapes	A location in the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated. Likely positive effects as the regeneration of older style offices & industrial/warehouse type units in poor condition will improve the quality and character of the townscape.	**+**

STM18-24	**City Centre South** Area: 6.91 hectares **Capacity: 1,575 dwellings**	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	
1: To enable vibrant and inclusive communities	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by	**++?**

	specific housing policies. Major positive effects indicated with such a capacity & opportunities for inclusive communities for this site in the city centre. A range of public realm works are proposed & these will contribute to social interactions. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs. **SA Suggestion**: ▪ Creative design for inclusivity & to encourage support social interaction	
2: To provide accessible essential services and facilities for all residents	Major positive effects indicated for this location in the city centre and a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby such as Lady Herbert's Gardens, Swanswell Park & Pool, Greyfriars Green, Spencer Park, and Charterhouse Field.	++
3: To improve health & promote active living	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental[219]. These factors are covered by the following SA Nos 4 & 5. There are some 10 health centres/general practices and 11 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances. With a location in the city centre, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the towpath. There is also easy access to a wide range of food shopping with associated positive effects for health. A range of public realm works are proposed & these will contribute to health & wellbeing. The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD[220] provides information	+

[219] For example: https://commonslibrary.parliament.uk/research-briefings/cbp-9414/
[220] Health Impact Assessment (HIA) Supplementary Planning Document (SPD)https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2

	and guidance on completing the relevant health toolkit and HIA.	
4: To provide decent and affordable housing for all	Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is in the city centre & with likely major positive effects. The Affordable Housing SPD (March 2022)[221] provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built. **SA Suggestion**: ▪ Creative design to encourage flexible & adaptable housing to support mix & tenure with changing needs	++
5: To support sustainable inclusive economic growth	Whilst provision of new homes is not directly attributable to economic growth, good quality homes in the city centre will support working people. Redevelopment for mixed uses proposed – residential, class E, learning & community uses, sui generis uses including drinking establishments – regeneration of the urban city centre core will have major positive effects for economic growth objectives – and could inspire enhancement beyond the site itself.	++
6: To help achieve the Council's ambition to reach net zero carbon emissions	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall. Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD[222] currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	0
7: To build resilience to	All new housing development will need to meet updated policy requirements that seek to help the Council build	0

[221] https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd
[222]Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) https://www.coventry.gov.uk/downloads/file/37976/energy-spd

climate change	resilience to climate change. The site is within Flood Zone 1 & partly within FZ2 indicating low risk of flooding.	
8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is some 17 minutes' walk to the south-west of the site. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	++
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
10: To protect & conserve natural resources – soil, water, minerals & waste[223]	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)[224] indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	+ 0
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	+?
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.	0?

[223] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[224] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratfor on Avon DC, & Warwick DC

	The site is within the city centre & within the Three Spires View Cone and partly within an archaeological constraint area - The Tall Buildings Design Guide & Three Spires View Framework SPD (2022)[225] provides further guidance to mitigate potential effects - other plan policies should provide mitigation measures. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies & creative detailed design.	
13: To protect and enhance the quality and character of townscapes & landscapes	A location in the city centre and designed according to policies as described above for SA No 12 should ensure that potential negative effects are mitigated. Likely major positive effects as the regeneration of the existing urban city centre core will significantly improve the quality and character of the townscape with the potential to inspire wider enhancements beyond the site itself.	**++**

STM001-23	**New Gate Court Business Park, Paradise Street** Area: 0.57 hectares **Capacity: 303 dwellings**	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	
1: To enable vibrant and inclusive communities	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site very close to the city centre. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental	**+**

225 https://edemocracy.coventry.gov.uk/documents/s54726/Appendix%201%20Draft%20Tall%20Building%20View%20Management%20Framework%20Guide%20SPD.pdf

	disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	
2: To provide accessible essential services and facilities for all residents	Major positive effects indicated for this location close to the city centre and a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby including Charterhouse Field less than 10 minutes' walk to the south-east.	**++**
3: To improve health & promote active living	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental[226]. There are some 6 health centres/general practices and 6 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a location near the city centre provides a potential variety of health services and within walking distances. These factors are covered by the following SA Nos 4 & 5. With a location so close to the city centre, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the canal towpath. There is also easy access to a wide range of food shopping with associated positive effects for health. The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD[227] provides information and guidance on completing the relevant health toolkit and HIA.	**+**
4: To provide decent and affordable housing for all	Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is so close to the city centre & with likely major positive effects.	**++**

[226] For example: https://commonslibrary.parliament.uk/research-briefings/cbp-9414/
[227] Health Impact Assessment (HIA) Supplementary Planning Document (SPD)https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2

	The Affordable Housing SPD (March 2022)[228] provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.	
5: To support sustainable inclusive economic growth	Whilst provision of new homes is not directly attributable to economic growth, good quality homes near to the city centre will support working people. Overall – neutral/not applicable effects.	**0**
6: To help achieve the Council's ambition to reach net zero carbon emissions	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall. Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD[229] currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	**0**
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	**0**
8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system; the location so close to the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is only 15 minutes' walk to the south-west of the site. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	**++**
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	**0**
10: To protect & conserve	Development on previously developed land is positive effects. Water resources and quality are protected	**+** **0**

[228] https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd
[229] Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) https://www.coventry.gov.uk/downloads/file/37976/energy-spd

natural resources – soil, water, minerals & waste[230]	through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)[231] indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	**+?**
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. The site is partly within an archaeological constraint area & the Old City Wall Scheduled Monument[232] is within the site boundary – therefore, development will need sensitive design - other plan policies provide mitigation. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies & creative detailed design.	**0?**
13: To protect and enhance the quality and character of townscapes & landscapes	A location so near to the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated. Likely positive effects as the regeneration of the existing underused commercial park will improve the quality and character of the townscape.	**+**

[230] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[231] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC
[232] https://historicengland.org.uk/listing/the-list/list-entry/1002979 and https://magic.defra.gov.uk/MagicMap.aspx

BAB01-23	**The Allesley Hotel, Birmingham Road** Area: 2.0 hectares **Capacity: 48 dwellings**	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	
1: To enable vibrant and inclusive communities	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site close to the city centre. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	+
2: To provide accessible essential services and facilities for all residents	Positive effects indicated for this location in Allesley and a range of essential services & facilities, including schools, a convenience shop, a village hall, a community centre, and pubs/restaurant. There is a range of open/green space around the village, particularly to the north and west. City centre facilities are within about 2.5 miles to the south-east	+
3: To improve health & promote active living	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental[233]. There are 2 health centres and a dental practice within about a mile of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. These factors are covered by the following SA Nos 4 & 5. There is a fitness centre within 15 min walk to the north and others within about 2.5 miles towards the city centre. The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD[234] provides information	+

[233] For example: https://commonslibrary.parliament.uk/research-briefings/cbp-9414/
[234] Health Impact Assessment (HIA) Supplementary Planning Document (SPD)https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2

	and guidance on completing the relevant health toolkit and HIA.	
4: To provide decent and affordable housing for all	Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is accessible to the city centre & with likely major positive effects. The Affordable Housing SPD (March 2022)[235] provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.	**++**
5: To support sustainable inclusive economic growth	Whilst provision of new homes is not directly attributable to economic growth, good quality homes will support working people. Overall – neutral/not applicable effects.	**0**
6: To help achieve the Council's ambition to reach net zero carbon emissions	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall. Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD[236] currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	**0**
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	**0**
8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system; the location is some 2.5 miles from the city centre. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	**+**

[235] https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd
[236]Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) https://www.coventry.gov.uk/downloads/file/37976/energy-spd

9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	**0**
10: To protect & conserve natural resources – soil, water, minerals & waste[237]	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)[238] indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	**+** **0**
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	**+?**
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. The site is within the Allesley Village conservation Area & within an archaeological constraint area – therefore, development will need sensitive design - other plan policies provide mitigation. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies & creative detailed design.	**0?**
13: To protect and enhance the quality	A location accessible to the city centre & designed according to other policy requirements as described	**+**

[237] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[238] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

and character of townscapes & landscapes	above for SA No 12 should ensure that potential negative effects are mitigated. Likely positive effects as the regeneration of the existing former hotel and associated hardstanding car park will improve the quality and character of the townscape.	

BW001-23	**Former Chace School, Chace Avenue, Willenhall** Area: 1.4 hectares **Capacity: 60 dwellings**	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	
1: To enable vibrant and inclusive communities	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site close to the city centre. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	+
2: To provide accessible essential services and facilities for all residents	Positive effects indicated for this location in Willenhall and a range of essential services & facilities, including schools, convenience shops/supermarket, a community centre, and cafes. There is a range of open/green space including the River Sowe with footpaths to the west and Binley Recreation Park about a mile to the east. City centre facilities are within about 2.5 miles to the north-west.	+
3: To improve health & promote active living	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental[239]. There are 3 health centres and a dental practice within about 0.5 mile of the site. It is not known at this stage of assessment whether these practices are taking new patients but	+

[239] For example: https://commonslibrary.parliament.uk/research-briefings/cbp-9414/

	other LP policies should ensure that there is capacity for such essential services. These factors are covered by the following SA Nos 4 & 5. There is a fitness centre within 15 min walk to the north and others within about 2.5 miles towards the city centre. The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD[240] provides information and guidance on completing the relevant health toolkit and HIA.	
4: To provide decent and affordable housing for all	Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is accessible to the city centre & with likely major positive effects. The Affordable Housing SPD (March 2022)[241] provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.	**++**
5: To support sustainable inclusive economic growth	Whilst provision of new homes is not directly attributable to economic growth, good quality homes will support working people. Overall – neutral/not applicable effects.	**0**
6: To help achieve the Council's ambition to reach net zero carbon emissions	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall. Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD[242] currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	**0**

[240] Health Impact Assessment (HIA) Supplementary Planning Document (SPD)https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2
[241] https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd
[242]Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) https://www.coventry.gov.uk/downloads/file/37976/energy-spd

7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	**0**
8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system; the location is some 2.5 miles from the city centre. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	**+**
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	**0**
10: To protect & conserve natural resources – soil, water, minerals & waste[243]	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)[244] indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	**+** **0**
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	**+?**
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic	**0**

[243] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[244] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	environment. Likely neutral effects on the historic environment.	
13: To protect and enhance the quality and character of townscapes & landscapes	A location accessible to the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated. Likely positive effects as the development of a cleared and vacant site will improve the quality and character of the townscape.	+
LS001-23	**Former School Site, New Century Park, Land to the south of Isadora Lea** Area: 2.58 hectares **Capacity: 93 dwellings**	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	
1: To enable vibrant and inclusive communities	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site easily accessible to the city centre. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	+
2: To provide accessible essential services and facilities for all residents	Positive effects indicated for this location in the urban area with a range of essential services & facilities, including schools, several convenience shops/supermarkets, a community centres, pubs/restaurants and cafes. There is a range of open/green space including the River Sowe with footpaths to the east and it is adjacent to the Coventry Sphinx sports club to the west. City centre facilities are within about 2 miles to the west.	+

3: To improve health & promote active living	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental[245]. There are 4 health centres and 5 dental practices within about a mile of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. These factors are covered by the following SA Nos 4 & 5. There are 3 fitness centres/gyms within a mile of the site and others within about 2.5 miles towards the city centre. The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD[246] provides information and guidance on completing the relevant health toolkit and HIA.	+
4: To provide decent and affordable housing for all	Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is accessible to the city centre & with likely major positive effects. The Affordable Housing SPD (March 2022)[247] provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.	++
5: To support sustainable inclusive economic growth	Whilst provision of new homes is not directly attributable to economic growth, good quality homes will support working people. Overall – neutral/not applicable effects.	0
6: To help achieve the Council's ambition to reach net zero carbon emissions	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall. Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management	0

[245] For example: https://commonslibrary.parliament.uk/research-briefings/cbp-9414/
[246] Health Impact Assessment (HIA) Supplementary Planning Document (SPD)https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2
[247] https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd

	Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD[248] currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	**0**
8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system; the location is some 2 miles from the city centre. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	**+**
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	**0**
10: To protect & conserve natural resources – soil, water, minerals & waste[249]	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)[250] indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	**+** **0**
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	**+?**

[248]Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) https://www.coventry.gov.uk/downloads/file/37976/energy-spd
[249] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[250] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. Likely neutral effects on the historic environment.	**0**
13: To protect and enhance the quality and character of townscapes & landscapes	A location accessible to the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated. Likely positive effects as the development of a cleared and vacant site will improve the quality and character of the townscape.	**+**

SH004-24	**Land at Spon End** Area: 7.2 hectares **Capacity: 750 dwellings**	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	
1: To enable vibrant and inclusive communities	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site close to the city centre. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs. The site is part of the Citizen Housing[251] portfolio, a social housing provider, & the organisation has relocated occupants of the site where the existing homes are not considered fit for habitation. Therefore, potentially major positive effects for redeveloping a new inclusive community.	**++?**

[251] https://www.citizenhousing.org.uk/about-us/what-we-do/#row1

2: To provide accessible essential services and facilities for all residents	Positive effects indicated for this location in the urban area with a range of essential local services & facilities, including schools, several convenience shops/supermarkets, 3 community centres, pubs/restaurants and cafes. City centre facilities are within about 0.5 miles to the east.	+
3: To improve health & promote active living	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental[252]. There are 6 health centres and 9 dental practices within about a mile of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. These factors are covered by the following SA Nos 4 & 5. There are fitness centres/gyms within about 0.5 miles towards the city centre. The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD[253] provides information and guidance on completing the relevant health toolkit and HIA.	+
4: To provide decent and affordable housing for all	Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is accessible to the city centre & with likely major positive effects. The Affordable Housing SPD (March 2022)[254] provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.	++
5: To support sustainable inclusive economic growth	Whilst provision of new homes is not directly attributable to economic growth, good quality homes will support working people. Overall – neutral/not applicable effects.	0

[252] For example: https://commonslibrary.parliament.uk/research-briefings/cbp-9414/
[253] Health Impact Assessment (HIA) Supplementary Planning Document (SPD)https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2
[254] https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd

6: To help achieve the Council's ambition to reach net zero carbon emissions	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall. Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD[255] currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	**0**
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 2 & partly in FZ3 indicating risk of flooding.	**0**
8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system; the location is some 0.5 miles from the city centre & 1 mile from the railway station. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	**+**
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	**0**
10: To protect & conserve natural resources – soil, water, minerals & waste[256]	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)[257] indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	**+** **0**
11: To protect and enhance	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity.	**+?**

[255]Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) https://www.coventry.gov.uk/downloads/file/37976/energy-spd
[256] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[257] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

nature & biodiversity	These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. Likely neutral effects on the historic environment. The site is partly within the Spon End Conservation Area & partly within an archaeological constraint area – therefore, development will need sensitive design - other plan policies provide mitigation. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies & creative detailed design.	**0?**
13: To protect and enhance the quality and character of townscapes & landscapes	A location close to the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated. Likely positive effects as the regeneration of an area with dwellings not considered fit for habitation (currently vacant) will improve the quality and character of the townscape.	**++**
H2:3	**Walsgrave Hill Farm** Area: 59 hectares **Capacity: 900 dwellings** A long standing Local Plan Allocation – retained for the Local Plan Review; challenges to delivery relate to access & the A46 but this may be improved in due course.	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	
1: To enable vibrant and	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement	**++?**

inclusive communities	of community participation is likely to be guided by specific housing policies. Major positive effects indicated for this site with capacity to design inclusive communities for a range of people – uncertainty as depends on detailed design. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs. **SA Suggestion**: ▪ Creative design for inclusivity & to encourage support social interaction	
2: To provide accessible essential services and facilities for all residents	Positive effects indicated for this location at the edge of the city urban area with a variety of accessible services & facilities. City centre facilities are within about 3.5 miles to the south-west. The current site allocation recognises the need for expansion of schools to accommodate the increased need.	+
3: To improve health & promote active living	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental[258]. There are 2 health centres (but dental practices some 1.5 mile distance) within about 1 mile of the site. The current site allocation recognises the need to expand health services at Walsgrave Hill Farm to accommodate the increased population These factors are covered by the following SA Nos 4 & 5. There are various fitness centres within a mile of the site & access to wider green spaces, including the Sowe Valley footpath & Coombe Abbey Country Park. The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD[259] provides information and guidance on completing the relevant health toolkit and HIA.	+
4: To provide decent and	Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper	++

[258] For example: https://commonslibrary.parliament.uk/research-briefings/cbp-9414/
[259] Health Impact Assessment (HIA) Supplementary Planning Document (SPD)https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2

affordable housing for all	recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is accessible to the city centre & with likely major positive effects. The Affordable Housing SPD (March 2022)[260] provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.	
5: To support sustainable inclusive economic growth	Whilst provision of new homes is not directly attributable to economic growth, good quality homes will support working people. Overall – neutral/not applicable effects.	**0**
6: To help achieve the Council's ambition to reach net zero carbon emissions	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall. Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD[261] currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	**0**
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1& partly within FZ2 & 3 indicating a range of risk of flooding. Capacity studies have confirmed that the assessed number of homes can be delivered safely – neutral effects overall.	**0**
8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system; the location is some 3.5 miles from the city centre. The current site allocation recognises that proposals for revised junction works to the A46 at Clifford Bridge may impact on the delivery of dwellings and therefore some uncertainty for timings. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	**+?**

[260] https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd
[261] Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) https://www.coventry.gov.uk/downloads/file/37976/energy-spd

	SA Suggestion: ▪ Incorporate a safe walking/cycling network through the new development & linking to urban area to west & country area to east to encourage more active transport/living locally	
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	**0**
10: To protect & conserve natural resources – soil, water, minerals & waste[262]	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)[263] indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	**+** **0**
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects more certain as the site is near to the River Sowe & the wider countryside to the east providing creative opportunities for linking into green & blue infrastructure; uncertainty as depends on detailed design.	**++?**
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. Likely neutral effects on the historic environment. The current site allocation recognises risk to heritage and includes a requirement for retention and enhanced	**0**

[262] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[263] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	setting of listed buildings at Hungerley Hall Farm, thus providing mitigation measures.	
13: To protect and enhance the quality and character of townscapes & landscapes	A location accessible to the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated. Likely positive effects as the location between the urban area to the west & the countryside to the east offers opportunities for creative design.	+

H2:15	**Sandy Lane** Area: 2.7 hectares **Capacity: 250 dwellings** A current Local Plan Allocation – retained with increased density for the Local Plan Review	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	
1: To enable vibrant and inclusive communities	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects indicated for this site easily accessible to the city centre The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	+
2: To provide accessible essential services and facilities for all residents	Positive effects indicated for this site in the city urban area with a variety of accessible services & facilities. with a range of essential local services & facilities, including schools, several convenience shops/supermarkets, pubs/restaurants and cafes, including close to the Canal Basin & its services/facilities. City centre facilities are less than about one mile to the south.	+
3: To improve health &	Provision of good quality housing & access to employment is well established as contributing to better	+

promote active living	health and wellbeing – physical & mental[264]. There are several health centres & dentists within about 1 mile of the site. These factors are covered by the following SA Nos 4 & 5. There are several fitness centres within a mile of the site & green/open spaces nearby, such as Radford Recreation Ground, Naul's Mill Park, and the Coventry Canal towpath. The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD[265] provides information and guidance on completing the relevant health toolkit and HIA.	
4: To provide decent and affordable housing for all	Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is very accessible to the city centre & with likely major positive effects. The Affordable Housing SPD (March 2022)[266] provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.	**++**
5: To support sustainable inclusive economic growth	Whilst provision of new homes is not directly attributable to economic growth, good quality homes will support working people. Overall – neutral/not applicable effects.	**0**
6: To help achieve the Council's ambition to reach net zero carbon emissions	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall. Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy	**0**

[264] For example: https://commonslibrary.parliament.uk/research-briefings/cbp-9414/
[265] Health Impact Assessment (HIA) Supplementary Planning Document (SPD)https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2
[266] https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd

	SPD[267] currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1indicating a low of risk of flooding. Capacity studies have confirmed that the assessed number of homes can be delivered safely – neutral effects overall.	**0**
8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system, some 0.5 miles from the city centre. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	**+**
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	**0**
10: To protect & conserve natural resources – soil, water, minerals & waste[268]	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)[269] indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	**+** **0**
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	**+?**

[267]Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) https://www.coventry.gov.uk/downloads/file/37976/energy-spd
[268] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[269] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. Likely neutral effects on the historic environment. The current site allocation recognises that the site contains a locally listed building and is adjacent to the Canal Conservation Area - thus providing mitigation measures.	**0**
13: To protect and enhance the quality and character of townscapes & landscapes	A location accessible to the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated. Likely positive effects as the regeneration of this site will offer positive effects for townscape objectives.	**+**

STM014-24	**JE2:1 Friargate Mixed Use Scheme, City Centre** Area: 10.0 hectares **Capacity: 1,350 dwellings** Current allocation within the City Centre Area Action Plan CC12 for 400 new homes – partially implemented with the construction of 2 office blocks, a hotel, & public realm improvements. Changes to development types & capacities proposed.	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	
1: To enable vibrant and inclusive communities	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Major positive effects indicated with such a capacity & opportunities for inclusive communities for this site in the city centre. The mix of uses, public realm improvements, and proposed enhanced housing capacity will contribute to social interactions.	**++?**

	The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs. **SA Suggestion**: ▪ Creative design for inclusivity & to encourage, support social interaction	
2: To provide accessible essential services and facilities for all residents	Major positive effects indicated for this location in the city centre and a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby such as Lady Herbert's Gardens, Swanswell Park & Pool, Greyfriars Green, Spencer Park, and Charterhouse Field.	++
3: To improve health & promote active living	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental[270]. These factors are covered by the following SA Nos 4 & 5. There are many health centres/general practices and dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances. With a location in the city centre, there is easy access to a range of health/fitness facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the canal towpath. There is also easy access to a wide range of food shopping with associated positive effects for health. The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD[271] provides information and guidance on completing the relevant health toolkit and HIA.	+
4: To provide decent and affordable housing for all	Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable	++

[270] For example: https://commonslibrary.parliament.uk/research-briefings/cbp-9414/
[271] Health Impact Assessment (HIA) Supplementary Planning Document (SPD)https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2

	homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is in the city centre & with likely major positive effects. The Affordable Housing SPD (March 2022)[272] provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built. **SA Suggestion**: ▪ Creative design to encourage flexible & adaptable housing to support mix & tenure with changing needs	
5: To support sustainable inclusive economic growth	Whilst provision of new homes is not directly attributable to economic growth, good quality homes in the city centre will support working people. Redevelopment for mixed uses proposed – residential, class E, learning & community uses, sui generis uses including drinking establishments – regeneration of the urban city centre core will have major positive effects for economic growth objectives – and could inspire enhancement beyond the site itself with sportive implications for the sub-regional economy.	++
6: To help achieve the Council's ambition to reach net zero carbon emissions	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall. Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD[273] currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	0
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	0
8: To reduce traffic & improve	The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel & should discourage car travel as	++

[272] https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd
[273]Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) https://www.coventry.gov.uk/downloads/file/37976/energy-spd

sustainable transport choices	most services & facilities will be accessible by walking or public transport. The main railway station is adjacent to the south of the site. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	**0**
10: To protect & conserve natural resources – soil, water, minerals & waste[274]	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)[275] indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	**+** **0**
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	**+?**
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. The site is within the city centre & within the Three Spires View Cone and but not within an archaeological constraint area - The Tall Buildings Design Guide & Three	**0?**

[274] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[275] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratfor on Avon DC, & Warwick DC

	Spires View Framework SPD (2022)[276] provides further guidance to mitigate potential effects - other plan policies should provide mitigation measures. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies & creative detailed design.	
13: To protect and enhance the quality and character of townscapes & landscapes	A location in the city centre and designed according to policies as described above for SA No 12 should ensure that potential negative effects are mitigated. Likely major positive effects as the regeneration of the existing urban city centre core will significantly improve the quality and character of the townscape with the potential to inspire wider enhancements beyond the site itself.	**++**

BAB016-24	**Land North of A45** Developable Area: 11.81 hectares **Employment**	
Sustainability Objective	**Assessment of Effects** **Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty**	
1: To enable vibrant and inclusive communities	The provision of good quality accessible employment will support vibrant communities.	**+?**
2: To provide accessible essential services and facilities for all residents	Positive effects indicated for this employment location adjacent to the A45 with local facilities within a mile in Allesley & Eastern Green; city centre facilities are within about 4 miles to the south-east.	**+?**

276 https://edemocracy.coventry.gov.uk/documents/s54726/Appendix%201%20Draft%20Tall%20Building%20View%20Management%20Framework%20Guide%20SPD.pdf

3: To improve health & promote active living	Provision of & access to employment is well established as contributing to better health and wellbeing – physical & mental[277]. The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD[278] provides information and guidance on completing the relevant health toolkit and HIA.	+
4: To provide decent and affordable housing for all	Employment site – neutral effects on housing.	0
5: To support sustainable inclusive economic growth	The Council cannot find sufficient employment land within its own administrative area in order to meet identified needs. Therefore, the identification of this site for employment, close to the urban environment & readily accessible via the adjacent A45 to the city and the wider strategic transport network suggests likely major positive effects for economic growth objectives.	++
6: To help achieve the Council's ambition to reach net zero carbon emissions	All new development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall. Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD[279] currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	0
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1, 2 & 3 indicating some risk of flooding but this will be mitigated through national requirements to ensure safety for employment uses.	0

[277] For example: https://commonslibrary.parliament.uk/research-briefings/cbp-9414/
[278] Health Impact Assessment (HIA) Supplementary Planning Document (SPD)https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2
[279]Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) https://www.coventry.gov.uk/downloads/file/37976/energy-spd

8: To reduce traffic & improve sustainable transport choices	The site is some 0.5 miles north-west of the urban environment adjacent to the A45 - well connected and with a good transport system; the location is some 4 miles from the city centre. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	+
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
10: To protect & conserve natural resources – soil, water, minerals & waste[280]	The land is classed as Grade 3 moderate to good agricultural land & therefore, negative effects for loss of best & most versatile agricultural land & the important soils resource. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)[281] indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	- 0
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	+?
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. Likely neutral effects on the historic environment as site not located in any sensitive areas.	0

[280] First cell refers to land/soil & water resources; second cell refers to minerals & waste
[281] JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

13: To protect and enhance the quality and character of townscapes & landscapes	The site is located within the Green Belt with potential negative effects. There are some other established employment sites in Pickford Green indicating that such new development could be accommodated locally. However, the site is located in Area 1 of the Green Belt – it is the largest area & considered to make a significant contribution to the GB purposes. It forms part of the wider Meriden Gap and Coundon wedge, any built development on the western extremity of the built-up area would be extremely sensitive. Further development in this area would therefore have the effect of substantially reducing its open character leading to the appearance of urban sprawl and very significant encroachment of the open countryside in this strategically important area of Green Belt between Coventry and Birmingham[282]. Therefore, likely major negative effects for landscape and Green Belt objectives.	--

[282] Coventry City Council Green Belt Technical Review Update (July 2024)

Agenda items 11 and 12
Council – 2 September 2025

Recommendations from Cabinet
26 August 2025

Coventry City Council
Minutes of the Meeting of Cabinet held at 2.00 pm on Tuesday, 26 August 2025

Present:

Members:	Councillor G Duggins (Chair) Councillor AS Khan (Deputy Chair) Councillor N Akhtar Councillor K Caan Councillor P Hetherton Councillor J O'Boyle Councillor P Seaman
Non-Voting Deputy Cabinet Members:	Councillor S Agboola Councillor P Akhtar Councillor B Christopher Councillor D Toulson
Non-Voting Opposition Members:	Councillor J Gardiner Councillor S Gray (on behalf of Councillor E Reeves) Councillor G Ridley
Other Non-Voting Members:	Councillor R Lakha Councillor G Lloyd

Employees (by Service Area):

Children's and Education Services	S Sen (Director), M Steele
Finance and Resources	B Hastie (Director), P Helm
Law and Governance	J Newman (Director), S Bennett
Planning and Performance	C Boden-Hatton (Director)
Regeneration and Economy	R Back, D Keaney, C Styles
Apologies:	Councillors R Brown, L Bigham, G Hayre, P Male, C Miks, E Reeves, K Sandhu

Public Business

16. **Declarations of Interest**

There were no disclosable pecuniary interests.

19. **Local Plan Review - Submission for Examination**

Cabinet considered a report of the Director of Regeneration and Economy which indicated that Local Plans should be considered for review at least once every five years, as laid out in Paragraph 33 of the National Planning Policy Framework and (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012).

As the Local Plan was adopted in December 2017, Council approved the commencement of a full review of the Local Plan on 6th December 2022 with the objective of ensuring policies are up to date, in line with changes to national policy and guidance, and that they continue to reflect local priorities. Cabinet noted that the Coventry City Area Action Plan, was adopted alongside the Local Plan, and this will be incorporated in this review. Therefore, all references to 'The Local Plan', 'The Plan' and 'Plan Review' incorporate both documents.

Each policy in the 2017 Local Plan has been considered in turn in the context of current legislation and guidance and, where appropriate, updated evidence. The Reviewed Local Plan includes some polices that are unchanged from 2017, some with varying degrees of change and, where necessary, some new policies.

Consultation has been undertaken in line with the relevant regulations and the adopted Statement of Community Involvement to ensure that individuals, communities, stakeholders, and other organisations have ample opportunity to engage through a variety of means. The established planning policy database will directly notify those registered at the launch of the consultation.

Having completed the mandatory stages of consultation in Plan making, approval was now sought to submit the reviewed Local Plan for examination with the Planning Inspectorate and delegate authority to the Director of Regeneration and Economy, following consultation to the Cabinet Member for Housing and Communities, to make the necessary arrangements for examination including any modifications requested to the Plan during the examination period. Further to examination and upon receipt of a report from the Planning Inspectorate that the Plan has been found to be 'sound', the Local Plan will return to Council for adoption.

The report indicated that the Regulation 19 Version of the full Local Plan has been produced further to earlier stages of consultation and engagement and officers consider should be submitted to the Secretary of State for public examination. It therefore contains the information and detail that would be found in an adopted Local Plan.

The Regulation 19 Plan is informed by an up-to-date evidence base, which has been published in full alongside the Regulation 19 consultation. In the formulation of the reviewed Plan, officers and the Local Plan Advisory Panel have considered

feedback from the Regulation 18 and Regulation 19 consultations, alongside the relevant expert evidence.

The Local Plan Review contains the following development targets for the 2021-2041 plan period:

- 29,100 dwellings;
- 60ha employment land;

The proposed development targets are informed by the 2022 Coventry and Warwickshire HEDNA (Housing and Economic Development Needs Assessment) and additional updated evidence. Development that has already been completed in the 2021-2041 period counts towards these targets and therefore new allocations proposed within the plan are for the quantities of additional development required to achieve these overall targets.

The Local Plan Review does not propose any changes in respect of Greenbelt boundaries or designations. All newly proposed development allocations are on previously developed land and therefore in line with the Local Authorities 'brownfield first' approach to identifying development land. In pursuing an approach of 'brownfield first' and protection of the City's remaining areas of Greenbelt, the Regulation 19 Version also reviews the policy areas of development density and design. This approach is in alignment with National Governments priority for higher density development within urban areas, alongside locally embedding high quality standards upon design and internal living spaces.

The City of Coventry has a tightly-drawn administrative boundary and therefore development land is always in short supply. Through the allocation of brownfield development sites, the Council is able to identify land to meet the overall target of 29,100 dwellings. However, at this stage and notwithstanding a dedicated 'call for sites' being undertaken for employment land, identification of land to meet the overall employment land need has not been possible. The Council recognises the need to support the local economy and enable job creation and continues to work with our Duty to Cooperate partners to consider strategic options for meeting this need in the absence of suitable available sites within the city.

The Local Plan Advisory Panel has made clear the priority for the delivery of Social Rented housing and a suitable mix of house types to meet the needs of communities within the city. To the end, the policies proposed within the Reviewed Local Plan include the following changes:

- Reduced threshold for the provision of Affordable Housing on new development sites – any site over 10 dwellings should now provide Affordable Housing
- An increased proportion of Social Rented housing on all qualifying sites
- Adoption of Nationally Described Space Standards for all new housing developments

In respect of Climate Change, the Regulation 19 Plan includes new and revised policies seeking to reduce the negative environmental impacts of new development. These policies are proposed to surpass current Building Regulations requirements for both residential and non-residential new build requirements, and policies are included for the setting of new standards for developers to meet for

on-site renewable energy generation, restrictions in the use of fossil fuels and improved thermal efficiency.

The Plan review has undertaken to develop policy to guide the highest possible quality of development throughout the city, this includes both the development of new policy standards, and also a review of the engagement of current policy in the past plan period. Where additional clarity has been identified as being required, or modifications to be responsive to market delivery this has also been incorporated into policy development.

There are several policy areas where the Council would have wished to set higher and more ambitious standards for new development to meet our wider aspirations for the city and its communities, however national planning guidance requires that the viability of development is considered when formulating local planning policy. To that end, the viability implications of the policy proposals within the Reviewed Local Plan have been fully assessed and have iteratively informed the policy detail. The Plan therefore seeks to deliver a balanced set of changes to policy that will enable development to sustainably meet the needs of the city.

The report provides information in relation to the following:-

- Changes to the National Planning Policy Framework
- Technical Requirements
- Public Consultation on the Proposed Submission

RESOLVED that Cabinet endorses the submission of the draft Coventry Local Plan at Appendix 1 – 5 together with relevant associated documentation for independent examination by the Secretary of State and recommends that Council:-

(1) Approves the submission of the draft Coventry Local Plan at Appendix 1 – 5 together with relevant associated documentation for independent examination by the Secretary of State.

(2) Directs that submission is accompanied by a request that the Inspector appointed to carry out the examination recommends any modifications necessary to make the Coventry Local Plan sound and legally compliant in accordance with Section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended).

(3) Delegates authority to the Director of Regeneration and Economy, following consultation with Cabinet Member for Housing and Communities, to take or authorise such steps as may be necessary for the independent examination of the Coventry Local Plan to be completed including but not limited to:

a) Makes appropriate arrangements for submission of the Coventry Local Plan and the completion and submission of all documents relating to the Coventry Local Plan;

b) Makes all necessary arrangements for examination including:

- **the appointment of a Programme Officer;**

- **the undertaking and/or commissioning of other work necessary to prepare for and participate at examination;**

- **proposing main and/or minor modifications to the Plan and/or modifications to the Policies Map;**

- **entering into Memorandums of Understanding and Statements of Common Ground; and**

- **the delegation to officers and other commissioned experts to prepare and submit evidence, representations and submissions to the examination and, where necessary, appear at any hearing sessions and represent the Council; and**

c) Implements any consequential actions relating to the examination, including undertaking any consultation that may be necessary, and publishing the recommendations and reasons of the person appointed to carry out the examination.

20. **Local Development Scheme (LDS) Update**

Cabinet considered a report of the Director of Regeneration and Economy which indicated that the Planning & Compulsory Planning Act 2004, as amended by the Localism Act 2011, requires each local planning authority to prepare and maintain a document setting out the programme for the preparation of planning documents. This is known as the Local Development Scheme (LDS).

The LDS is a project plan for preparing planning documents, but it is not a policy document itself. It provides a starting point for the local community and stakeholders to find out what planning documents are being prepared by the Council and the timetable for when these documents will be produced. In particular, it sets out the timetable for the review and update of the Council's Local Plan and outlines the dates when there will be formal opportunities to get involved with the plan making process.

Local Plans must be considered for review at least once every five years, as laid out in Paragraph 33 of the National Planning Policy Framework:

> "Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary"

In November 2022, Cabinet and Council gave authority to progress with a full review of the Local Plan, seeking to assess if the existing suite of policies had proven effective in decision making, and if these policies aligned with the wider corporate objectives of the Local Authority. Cabinet and Council authority to progress to the Regulation 19 stage of plan making was agreed in January 2025,

and the representations from this publication have now been analysed to inform the forthcoming timelines of the Local Plan Review process.

Further to analysis of the representations received from public consultation, which informs the necessary evidence base to progress to further stages of the plan review, the Local Development Scheme has been reviewed to ensure that the timescales presented provide an accurate forecast of the forthcoming stages. There are several variables that may lead to that timeline being extended including the unavailability of Inspectors to convene the Examination in Public or a longer time needed to assess and integrate complex representations to the consultations. Any significant delays will be reported to Cabinet in future reports.

An indicative timeline of the Plan review was detailed in the report and included in a refreshed Local Development Scheme at Appendix One to the report.

RESOLVED that Cabinet recommends that Council:-

1) **Adopts the updated draft Local Development Scheme attached at Appendix 1 of the report to take effect immediately.**

2) **Delegates authority to the Director of Regeneration and Economy, following consultation with Cabinet Member for Housing and Communities, to prepare the Local Development Scheme for publication and correcting any minor errors provided that that such changes do not affect the substantive contents of the Local Development Scheme.**

Coventry City Council

Public report
Cabinet

Cabinet 26th August 2025

Council 2nd September 2025

Name of Cabinet Member:
Cabinet Member for Housing and Communities – Councillor N Akhtar

Director Approving Submission of the report:
Director of Regeneration and Economy

Ward(s) affected:
All Wards

Title:
Local Development Scheme (LDS) Update

Is this a key decision?

Yes – This report affects people living and working in more than 2 wards in the City

Executive Summary:

Further to Cabinet and Councils decision to progress with a full review of the Coventry Local Plan in November 2022, the Local Development Scheme has been updated to indicate the timescales and the ongoing process of the review. The Local Authorities Local Development Scheme should be kept up to date and made publicly available in order enable the local community and interested parties to be informed of progress.

Further to the findings from the Regulation 19 stage consultation, the timescales have been reviewed and an updated LDS produced, attached at Appendix One to the report to illustrate the progress of the Local Plan Review.

Recommendation:

Cabinet is requested to recommend that Council;

1) Adopts the updated draft Local Development Scheme attached at Appendix 1 of this report to take effect immediately.

2) Delegates authority to the Director of Regeneration and Economy, following consultation with Cabinet Member for Housing and Communities to prepare the Local Development Scheme for publication and correcting any minor errors provided that that such changes do not affect the substantive contents of the Local Development Scheme.

Council is recommended to:

1) Adopt the updated draft Local Development Scheme attached at Appendix 1 of this report to take effect immediately.

2) Delegate authority to the Director of Regeneration and Economy, following consultation with Cabinet Member for Housing and Communities to prepare the Local Development Scheme for publication and correcting any minor errors provided that that such changes do not affect the substantive contents of the Local Development Scheme.

List of Appendices included:

Appendix 1 - Draft Local Development Scheme September 2025

Background papers:

Adopted Local Development Scheme December 2024

Other useful documents

November 2022 Cabinet Report - Local Plan Review
December 2024 Cabinet and Council Report – Local Plan Review Regulation 19 stage 2017 Local Plan

Has it been or will it be considered by Scrutiny?

No

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

No – However the Local Plan Review is informed by Local Plan Cabinet Advisory Panel

Will this report go to Council?

No

Report title: Local Development Scheme Update

1. **Context (or background)**

1.1. The Planning & Compulsory Planning Act 2004, as amended by the Localism Act 2011, requires each local planning authority to prepare and maintain a document setting out the programme for the preparation of planning documents. This is known as the Local Development Scheme (LDS).

1.2. The LDS is a project plan for preparing planning documents, but it is not a policy document itself. It provides a starting point for the local community and stakeholders to find out what planning documents are being prepared by the Council and the timetable for when these documents will be produced. In particular, it sets out the timetable for the review and update of the Council's Local Plan and outlines the dates when there will be formal opportunities to get involved with the plan making process.

1.3. Local Plans must be considered for review at least once every five years, as laid out in Paragraph 33 of the National Planning Policy Framework:

*"*Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary"

1.2 In November 2022, Cabinet and Council gave authority to progress with a full review of the Local Plan, seeking to assess if the existing suite of policies had proven effective in decision making, and if these policies aligned with the wider corporate objectives of the Local Authority.

1.3 Cabinet and Council Authority to progress to the Regulation 19 stage of plan making was agreed in January 2025, and the representations from this publication have now been analysed to inform the forthcoming timelines of the Local Plan Review process.

1.4 Further to analysis of the representations received from public consultation, which informs the necessary evidence base to progress to further stages of the plan review, the Local Development Scheme has been reviewed to ensure that the timescales presented provide an accurate forecast of the forthcoming stages.

1.5 There are several variables that may lead to that timeline being extended including the unavailability of Inspectors to convene the Examination in Public or a longer time needed to assess and integrate complex representations to the consultations. Any significant delays will be reported to Cabinet in future reports.

1.6 An indicative timeline of the plan review is shown below and is included in a refreshed Local Development Scheme at Appendix One to the report.

	2023		2024				2025				2026			
	Q3 (July-Sept)	Q4 (Oct-Dec)	Q1 (Jan-Mar	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)	Q1 (Jan-Mar	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)
Regulation 18 Consultation														
Representation Analysis														
Policy & Plan preparation														
Regulation 19 Consultation														
Representation Analysis														
Submission														
PINS Examination														
Adoption														

2. Options considered and recommended proposal.

2.1 Cabinet could choose to seek revisions to the LDS and choose not to adopt the updated Local Development Scheme at this stage, however publication of the timelines aids local communities and interested parties to monitor the progress of the Local Plan Review, and is informed by public consultation to date. Furthermore, the production of the LDS is a legal requirement and were this course of action to be pursued, the Council would contravene the relevant statutory requirements. It should be noted that the government is monitoring all local authorities to ensure that their Local Plans are prepared in accordance with the published LDS. Failure to have an up-to-date LDS could therefore result in poor national monitoring outcomes with the consequential reputational damage. As such this option is not recommended.

2.2 Cabinet could choose to adopt the updated Local Development Scheme to update local communities and interested parties of the progress of the Local Plan review. This option is recommended.

3. Results of consultation undertaken

3.1. Whilst no direct consultation has taken place on the LDS, the timelines of the Local Plan Review are informed by Regulation 18 consultation which was held between 18th July and 29th September 2023 and the Regulation 19 stage publication held between 20th January and 3rd March 2025.

4. Timetable for implementing this decision

4.1. The decision will be implemented with immediate effect.

5. Comments from the Director of Finance and Resources and the Director of Law and Governance

5.1. Financial implications

There are no direct financial implications of publication of the updated Local Development scheme.

5.2. Legal implications

5.2.1 Local Planning Authorities must prepare and maintain a scheme to be known as their Local Development Scheme (LDS).

5.2.2 The LDS must specify broadly:

(a) the local development documents which are to be development plan documents;

(b) the subject matter and geographical area to which each development plan document is to relate;

(c) which develop plan documents are to be prepared jointly with other local planning authorities; and

(d) the timetable for preparation and revision of the development plan documents.

5.2.3 If a local planning authority fails to prepare an LDS, the Secretary of State may do so and direct that the same is brought into effect.

5.2.4 To bring an LDS into effect, a local planning authority must resolve that the scheme is to have effect and specify the date from which the scheme is to have effect.

5.2.5 A local planning authority must:

(a) revise an LDS at such time as they consider appropriate; and

(b) make the following available to the public:

(i) the up-to-date text of the LDS,
(ii) a copy of any amendments made to the LDS, and,
(iii) up-to-date information showing the state of the authority's compliance (or non-compliance) with the timetable for the preparation and revision of the development plan documents.

6. Other implications

6.1. How will this contribute to the One Coventry Plan (https://www.coventry.gov.uk/strategies-plans-policies/one-coventry-plan)

6.2. Through progressing the timelines within the LDS, the Local Plan will continue to contribute to aims of the One Coventry Plan such as improving the lives of current and future residents, ensuring the delivery of affordable homes, employment opportunities and accessible open space.

6.3. **How is risk being managed?**

An internal risk log has been developed and will be updated as progress is made or changes occur and will be reviewed at the monthly Plan Review meeting held between officers and the Cabinet Member for Housing and Communities.

6.4. **What is the impact on the organisation?**

There will be a staffing and resource impact from these proposals in order to deliver upon the stated timelines, however these are anticipated to be absorbed within current staffing provision.

6.5. **Equality/ EIA**

A full Equality and Impact Assessment (EqIA) was undertaken as part of developing the Local Plan. As part of that analysis, the Council had due regard to its public sector equality duty under section 149 of the Equality Act (2010).

6.6. **Implications for (or impact on) climate change and the environment**

The continued development of a reviewed Plan as outlined in the LDS will allow the Council to consider additional policies related to climate change and the environment.

6.7. **Implications for partner organisations?**

None

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Coventry City Council

Local Development Scheme

September 2025

Coventry City Council

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1.0 Introduction

1.1 The Local Development Scheme (LDS) is a project plan which sets out which Local Plan documents are to be prepared, and the timetable for the preparation and completion of these so that local communities and interested parties can keep track of progress.

1.2 It is a legal requirement[1] that an LDS is prepared, kept up to date and made publicly available. This LDS will therefore be published on the Council's website.

1.3 The documents which are covered by this LDS the Local Plan Review and the Houses in Multiple Occupancy (HMO) Development Plan Document (DPD) The LDS sets out the anticipated timing of the forthcoming stages and Examination of the Plan Review. We also include a section upon Neighbourhood Plans which communities can choose to prepare for their local area should they wish to do so.

[1] Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended

2.0 The previous LDS

2.1 The previous Local Development Scheme was published in December 2024. It is important that the LDS is updated to reflect the progress of implementation of the decision to undertake a full Plan Review.

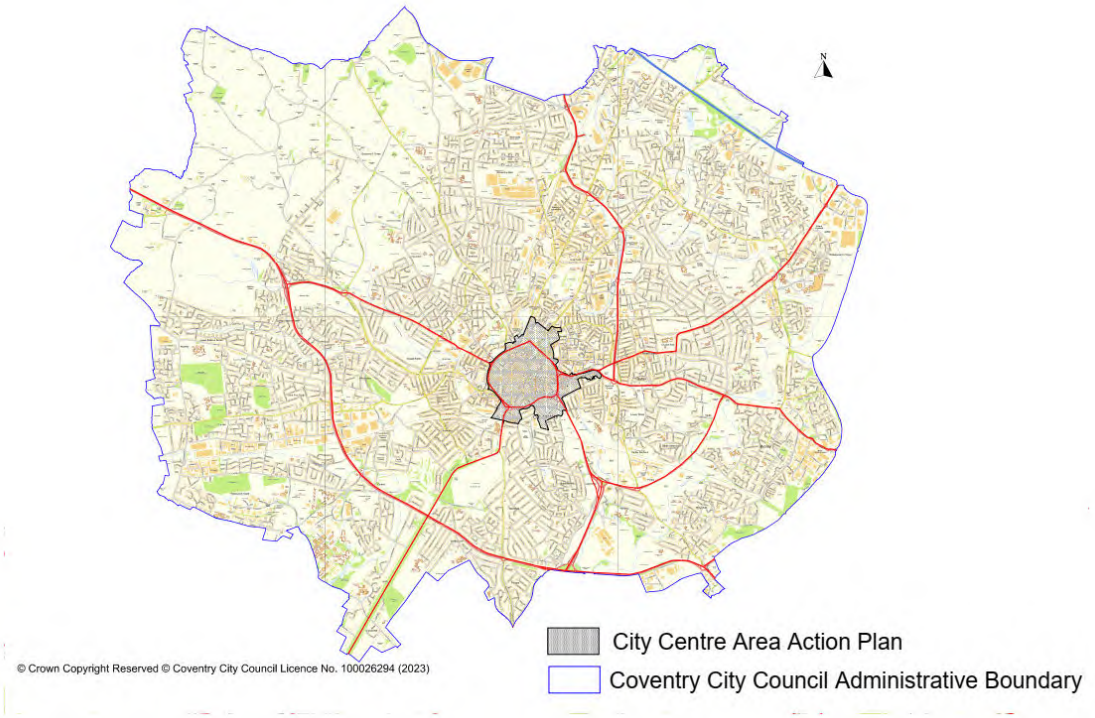
2.2 The LDS includes the HMO DPD and associated Article 4 Direction which has now been confirmed. The timetable of the process of bringing this into adoption is included for clarity.

3.0 Development Plan Documents

3.1 Development Plan Documents (DPDs) are defined in the Local Plan Regulations 2012 (as amended). They address the development and use of land, the allocation of certain sites for particular purposes (for example housing, employment, retail, green space) and they include planning policies against which planning applications are assessed to help determine whether particular proposals are acceptable or not. DPDs have to be prepared in line with strict legal procedures, must be informed by robust evidence to ensure the policies and land allocations are soundly based and justified, and must be publicly examined by an independent Planning Inspector before they can be formally adopted by the Council.

3.2 The adopted DPDs for Coventry City Council are the Local Plan and the Homes in Multiple Occupation DPD which cover the entire administrative area of the City Council, and the City Centre Area Action Plan which covers the City Centre (Both shown in Figure 1).

Figure 1



3.3 It should also be noted that Neighbourhood Plans can form part of the Development Plan: communities can choose to produce these for their local area should they wish to do so. Further information is contained within Chapter 5.

3.4 The Local Plan Regulations[2] require that Local Plans must be reviewed every five years, starting with the date of adoption. The review must consider changing circumstances affecting the area, or any relevant changes in national policy[3] in order to determine whether any strategic policies need updating.

3.5 Bearing in mind the aforementioned requirement, Table 1 sets out the timetable currently underway for a full review of the Local Plan, this being inclusive of the City Centre Action Plan.

[2] Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012
[3] National Planning Policy Framework 2021 paragraph 33

Table 1: Local Plan review timetable

	2023		2024				2025				2026			
	Q3 (July-Sept)	Q4 (Oct-Dec)	Q1 (Jan-Mar	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)	Q1 (Jan-Mar	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)
Regulation 18 Consultation														
Representation Analysis														
Policy & Plan preparation														
Regulation 19 Consultation														
Representation Analysis														
Submission														
PINS Examination														
Adoption														

3.6 Table 2 below sets out the undertaken timelines of the Homes in Multiple Occupation DPD and, for clarity, also includes the concluded delivery timeline for the associated Article 4 Direction. The DPD covers the same geographical area as the Coventry City Council administrative boundary illustrated in Figure 1.

Table 2: Houses in Multiple Occupancy DPD timetable

	2022		2023				2024				2025			
	Q3 (July-Sept)	Q4 (Oct-Dec)	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)
HMO DPD	C*	C*	P	P			E	E	E		A			
Article 4 Direction	C	C				A4C								

C – Consult

C* - Consultation (Regulation 18)

P – Publication (Proposed submission – Regulation 19)

A – Adopted

E – Examination

A4C – Article 4 Confirmation

Regulations refer to those set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

4.0 Supplementary Planning Documents & Design Codes

4.1 Supplementary Planning Documents (SPDs) can be produced to elaborate upon adopted Local Plan policy where it is helpful to provide more detail to help deliver the policies of an adopted Local Plan. They cannot introduce new policy.

4.2 Following the Local Plan examination, the Council intends to produce an update to its Health Impact Assessment Supplementary Planning Document (HIA SPD), which will cover the administrative area of Coventry City Council.

4.3 A Supplementary Planning Document has recently been jointly produced between Coventry City Council and Warwick District Council to support the continued growth and expansion of the University of Warwick. This is set out in policy DS2 of the adopted Coventry Local Plan which supports cross boundary partnership working, including the production of SPDs with growth and expansion of the University of Warwick specifically cited.

4.4 The timetable for producing and consulting upon the anticipated SPDs is set out below.

Table 3: SPD timetable

	2024				2025				2026			
	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)
University of Warwick SPD			C	A								
Shop front Design Guide SPD								C	A			
Health Impact Assessment SPD Update										C	A	
Biodiversity Net Gain SPD Update										C	A	
Coventry Connected SPD Update											C	A
Sustainable Drainage SPD											C	A

C – Consult A – Adopt

4.5 The Levelling up and regeneration act 2023 introduced at paragraph 15F, a requirement for Local Authorities to produce Design Codes which should be considered for planning permissions to be granted. Coventry City Council aim to meet this requirement in the production of area specific codes commencing initial

consultation during 2025, as set out below. The below is the currently anticipated Design Codes structure for the City, however this may be revised during the evolution of the Design Codes, and the findings of public consultations.

Table 4: Design Code timetable

	2025				2026				2027			
	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)
CCC Localised Design Code Area One				C		A						
CCC Localised Design Code Area Two					C		A					
CCC Localised Design Code Area Three						C		A				
CCC Localised Design Code Area Four							C		A			

5.0 Neighbourhood Plans

5.1 Communities can choose to prepare Neighbourhood Plans for their area should they so wish. These are independently examined and provided they meet a number of 'basic conditions' they can be voted on at referendum and, provided that a majority of the community vote in favour they can then be 'made' (ie adopted) as part of the Development Plan for the area. Planning applications can therefore be assessed to check whether they comply with the policies of the plan. Further information can be found at https://www.gov.uk/guidance/neighbourhood-planning--2

5.2 There is one adopted Neighbourhood Plan within Coventry City Council's area, Willenhall. This was made on 18th June 2018.

5.3 Two further Neighbourhood Areas have been designated: Allesley (designated on 4th May 2016) and Finham (designated on 16th March 2017) however these have not reached an advanced stage yet.

5.4 Up to date information on neighbourhood plans, their status and the geographical areas covered can be found at www.coventry.gov.uk/localplan

6.0 Monitoring and Data Standards

6.1 Progress on the compliance with the timetables contained within the Local Development Scheme will be reported in the Authority Monitoring Report which the Council publishes annually.

6.2 To comply with the legislation[4] all documents will be produced to accord with any data standards required by Government.

[4] Planning and Compulsory Purchase Act 2004 as amended by the Neighbourhood Planning Act 2017

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